
GAC Opening Plenary Session

Session 1

Session Objective

The GAC Opening Plenary Session is the first formal opportunity for GAC participants to gather, introduce themselves, and prepare for the ICANN Public Meeting. During this session the GAC Chair also typically (1) provides a “state of the committee” review; (2) summarizes the GAC meeting agenda for the week; and (3) identifies topic highlights and priority matters that merit GAC Members’ focus and attention.

For ICANN86, the Opening Plenary Session will also be when Mr. Ian Sheldon (Australia) will be elected by acclamation of the GAC to take office as the next GAC Chair at the conclusion of ICANN87 in October 2026, in accordance with GAC Operating Principles 31 and 32.

Leadership Proposal for GAC Action

1. Elect the next GAC Chair by acclamation.

Proposed Agenda

During this ICANN86 opening plenary session, the GAC Chair will welcome in-person and remote attendees, highlight particular aspects of the agenda for this Policy Forum, and share logistical information to help all attendees participate effectively during the meeting. It is also traditional for a representative of the government of the country hosting the ICANN Public Meeting to offer brief welcoming remarks during the opening plenary session.

The Chair will also highlight a number of substantive and operational matters that the committee is currently addressing and identify a number of work efforts that will attract committee attention in the coming months.

In this hybrid meeting format the committee will also engage in the traditional “tour de table” ceremony during which all GAC delegates will be invited to introduce themselves. First, in-person delegates will identify themselves, followed by remote participants who raise their hands in the collaborative Zoom Room to indicate their desire to speak. Delegates are welcome to share comments on their goals and expectations for the meeting.

Key Reference Documents

- [GAC ICANN86 Meeting Agenda and Related Information](#)

Document Administration

Title	ICANN86 GAC Session Briefing - GAC Opening Plenary Session
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GAC Capacity Development Sessions

Session 2 and 3

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Session Objective

In the effort to continue supporting the GAC's readiness for the opening of the New gTLD Program Next Round application process, a series of GAC Capacity Development sessions are planned, with a clear focus on enhancing understanding of the application process and available community input mechanisms, while also facilitating practical and interactive exchanges among GAC members on topics such as Early Warnings, GAC Advice, and national approaches to preparing for the next round.

As part of ongoing efforts to support GAC preparedness for the New gTLD Program: 2026 Round, the Capacity Development Sessions (CDS) at ICANN86 aim to enhance members' understanding of the application process, evaluation procedures, and available community input mechanisms, while also providing practical opportunities to discuss how governments may engage as the application process progresses.

Building on previous GAC capacity development activities focused on the Next Round, the sessions will combine informational updates with interactive discussions to support preparedness for future stages of the process, including GAC Early Warnings, GAC Advice, and other opportunities for GAC engagement.

The sessions are also intended to facilitate experience-sharing among GAC members regarding national approaches, anticipated challenges, and practical considerations for organizing work related to the Next Round.

Leadership Proposal for GAC Action

1. GAC Members to receive updates and capacity development support regarding the New gTLD Program: 2026 Round, including application procedures, evaluations, and opportunities for community input.
2. GAC Members to participate in practical discussions and exchanges on GAC Early Warnings, GAC Advice, and approaches to preparing for and engaging in the Next Round at the national level.
3. GAC Members to identify areas where further support, guidance, or capacity development activities may be useful to facilitate preparedness for future milestones in the New gTLD Program: Next Round.

Current Status and Recent Developments

GAC capacity development sessions (CDS) are built to provide an opportunity for GAC members to learn the basics or increase their knowledge on aspects of the ICANN multistakeholder model, its structure, and operations. It is also an opportunity for GAC attendees to become acquainted with different ICANN community groups in order to facilitate future dialogue, and to share experiences and best practices to enhance GAC internal collaboration on various ICANN matters.

Since 2025, the GAC's capacity development activities have primarily focused on topics related to the New gTLD Program: Next Round. The objective is to enhance the GAC's understanding of the relevant issues and processes, and to help GAC delegates prepare for the 2026 Next Round.

In preparation for ICANN86, GAC Support coordinated with GAC Topic Leads and the ICANN org Next Round team to develop a progressive approach to capacity development activities:

- **Capacity Development Session 1 (CDS1):** focused on enhancing understanding of the application process and opportunities for GAC and community input; and
- **Capacity Development Session 2 (CDS2):** designed as a practical and interactive session to explore approaches to GAC engagement and preparedness through examples, discussions, and experience-sharing.

This approach reflects input received from GAC Leadership and Topic Leads regarding the value of practical discussions and opportunities to explore differing perspectives and levels of preparedness among GAC members.

ICANN86 Capacity Development Sessions

Capacity Development Session 1

2026 New gTLD Program: Application Process, Evaluations, and Community Input

This session will begin with a status update on the 2026 Round of the New gTLD Program, followed by an overview of the key stages of the application and evaluation processes and available opportunities for community input, including public comments, GAC Early Warnings, GAC Advice, objections, and appeals. The session will include interactive elements, including polls and examples, with a view to supporting understanding of practical implications for governments and GAC members and allowing ample time for discussion and questions.

Capacity Development Session 2

GAC Readiness for the 2026 New gTLD Program: Practical Perspectives and Exchanges

Building on the first session, this practical and interactive session will feature smaller group exchanges on Early Warnings, GAC Advice, and national approaches to organizing work related to the New gTLD Program Next Round.

The session will use flip charts/posters to facilitate discussions, including scenario-based exchanges on GAC Early Warnings and GAC Advice, as well as experience-sharing on how governments are preparing for the next round.

Key Reference Documents

- [ICANN86 Plenary Session on New gTLDs Next Round](#)
[note: Until the session has taken place, the briefing will be published for GAC members' access only]
- [New gTLD Program website](#)
- [ICANN Policy Development Accelerator workspace](#)

Document Administration

Title	ICANN86 GAC Session Briefing - GAC Capacity Development Sessions
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GAC Discussion on Review of Reviews

Session 4

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Session Objective

The Review of Reviews is a collaborative effort that brings together ICANN’s Supporting Organizations and Advisory Committees, ICANN Board members, and ICANN org to manage a fundamental evaluation of the reviews set out in the ICANN Bylaws as a whole system, including their implementation, and propose a refreshed system of reviews.

Reviews are part of how ICANN remains accountable. A modernized review system will:

- Adapt and update the reviews process to reflect today’s environment and future needs rather than relying on processes developed more than a decade ago
- Reduce unnecessary burden on the ICANN community and org
- Improve trust and transparency
- Ensure reviews lead to actionable and implemented outcomes
- Support a more effective and resilient multistakeholder model

At ICANN86, GAC discussions will explore the committee’s perspective on the potential desired outcomes of this cross-community effort.

Leadership Proposal for GAC Action

1. Solicit GAC feedback on specific questions from the CCG’s current proposal that are relevant to the GAC and government concerns
2. Prepare for the expected Public Comment proceeding following ICANN86
3. Provide opportunity for GAC members to ask questions of the CCG Co-Chairs

Current Status and Recent Developments

The Review of Reviews Cross Community Group (CCG) is nearing completion of the third of its four planned phases of work. The CCG's first two phases of work comprised: (1) fact-finding; and (2) analysis and development of initial proposals. In Phase (3), the CCG is finalizing proposals that will be presented for discussion at ICANN86, following which an initial report will be published for Public Comment. Phase (4) will see the CCG complete its report and submit its recommendations to the ICANN Board. This is currently planned for August 2026.

The CCG is proposing a refreshed review system that will consist of three types of reviews:

- Accountability and Transparency (every 5 years, deferrable), to assess how ICANN has executed on its Mission in accordance with the Articles of Incorporation, its Bylaws, its Commitments and Core Values, and its transparency obligations set out in Article 3.1 of the ICANN Bylaws.
- Structural Review (every 15 years, deferrable and subject to a threshold to determine whether or not the review should proceed), divided into three phases. The first phase (6 months) will involve an external landscape assessment. In the second phase (15 months), a cross-community group will be convened to review all the SOAC structures (including the GAC and the Nominating Committee), investigate any existing or longstanding issues, and produce recommendations (if any), informed by the outcomes of Phase One. The third phase (12 months) will examine the implications of the recommendations, including to determine if changes are desirable to improve the overall effectiveness of ICANN.
- On-Demand Review (no fixed cadence, requires a high threshold including alignment across the SOACs, Board and staff), which can include topics such as:
 - Special topics (e.g., aspects of the New gTLD Program, security and stability, Review of Reviews); or
 - Emerging topics identified by the community or the Board that meet the specific criteria for a review, is not a topic that involves policy development, and is a topic that cannot be adequately addressed through Bylaws-mandated processes.
 - A Consequential Effects Review, which is initiated automatically in the event that an SO or AC [including the GAC], decides to make changes to its own structure, to examine the effects of the changes on the broader ICANN system; and make recommendations for how affected mechanisms should be adjusted.

In its [Mumbai Communique](#), the GAC had noted its special interest in the following topics:

- How important reviews – such as the Security, Stability, and Resiliency (SSR) Review and the Competition, Consumer Trust, and Consumer Choice (CCT) Review that are closely linked to the ICANN's mission established in the Bylaws – will be accommodated in the refreshed proposal;
- How the overall cadence and workload will look like after compiling all reviews on one timeline;
- How the final proposal will be driven by a functional approach, taking care that each review has a distinct function and a clear added-value, be mindful of resources, and be

communicated in clear, plain language, enabling those unfamiliar with ICANN to understand how the review system works.

The CCG will hold a dedicated [community session](#) at ICANN86, to continue discussions and solicit community feedback on the refreshed reviews system it is proposing in its Draft Report, with the aim to have an updated version to publish for Public Comments shortly after ICANN86.

Key Reference Documents

- [Review of Reviews Wiki Space](#)
- [ICANN86 Prep Week Webinar on Review of Reviews](#)
- [Refined Outline of Suggested Reviews System](#) (April 2026)

Document Administration

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GAC Operating Principles Evolution Working Group (GOPE WG) Proposal

Session #5

Session Objective

From time to time, the GAC holds sessions during ICANN Public Meetings to review, discuss, and make decisions on GAC operational matters, including committee processes, work planning, and updates to the GAC Operating Principles.

For ICANN86, this session will focus on proposed administrative updates to the GAC Operating Principles previously reviewed by the GOPE WG, discussion of next procedural steps, and consideration of initiating the formal revision process under Principles 52–53 of the GAC Operating Principles.

Leadership Proposal for GAC Action

Following review of the proposed administrative updates by the GOPE WG, the GOPE WG Co-Chairs propose progressing these amendments to the broader GAC membership for consideration.

Accordingly, GAC Members may be invited to consider initiating the formal process to revise the GAC Operating Principles under Principle 53.

Should Members support opening the Operating Principles to revision:

- A Member (or Members) would move, at a GAC meeting, for the Operating Principles to be revised;
- The motion would require a seconder and support by simple majority of Members physically present;
- The proposed revisions would then enter a sixty (60) day consultation period;
- At the next meeting following completion of the consultation period, Members would vote on whether to adopt the proposed revisions.

If the formal revision process is initiated at ICANN86 (June 2026), the consultation period would conclude approximately in mid-August 2026. Under that timeline, the next ICANN meeting following the consultation period would be ICANN87 (October 2026), at which point Members could consider adoption of the proposed revisions.

The ICANN86 session therefore provides an opportunity for Members to review the proposed administrative changes, discuss any outstanding questions, and consider whether to initiate the formal revision process.

Current Status and Recent Developments

The GOPE WG has reviewed proposed administrative updates to the GAC Operating Principles intended to improve clarity, consistency, and alignment with current GAC practices and references.

Prior to the most recent GOPE WG meeting (October 2025), GAC Support circulated:

- a redlined version of the GAC Operating Principles reflecting proposed administrative changes; and
- a clean version incorporating those changes.

The proposed amendments were discussed by the GOPE WG and subsequently recirculated for final review by Working Group members.

Following that review, the GOPE WG Co-Chairs agreed to progress the proposed administrative updates to the broader GAC membership for consideration.

During the GAC Leadership Retreat in April 2026, GAC Leadership also discussed the value of finalizing these administrative updates and progressing them through the formal process established under Principles 52–53 of the GAC Operating Principles.

Accordingly, ICANN86 discussions are expected to focus on:

- overview of the proposed administrative updates;
- procedural requirements and timing implications under Principles 52–53;
- consideration of whether to initiate the formal revision process; and
- possible subsequent steps, including consultation and eventual adoption timelines.

Indicative Timeline

- **October 2025:** GOPE WG review of proposed administrative amendments
- **May 2026:** Final GOPE WG review and progression to broader GAC membership
- **ICANN86** (June 2026): Possible initiation of formal revision process under Principle 53
- **August 2026** (~60 days following ICANN86): Conclusion of consultation period
- **ICANN87** (October 2026): Possible final consideration and adoption of revisions

Key Reference Resources

- Current [GAC Operating Principles](#)
- GOPE WG – [Proposed Administrative Updates \(Redlined Version\)](#)
- GOPE WG – [Proposed Administrative Updates \(Clean Version\)](#)

Document Administration

Title	ICANN86 - Session #5 - GAC Operating Principles Evolution WG Proposal
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Registration Data Issues

Session 6 and 6a Informational Session on Accuracy of Registration Data

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GAC Plenary Session Objective

This session aims to discuss status and consider possible next steps for the GAC in relation to the WHOIS/Registration Data policy framework, taking into account relevant Data Protection law.

The GAC will discuss latest developments and related policy concerns, in connection with:

- Status and next steps regarding the ongoing development of law enforcement requestor authentication mechanisms to enable implementation of the 24-hour timeline for Contracted Parties to respond to Urgent Requests for disclosure of registration data
- Modification of the GNSO policy recommendations for a System for Standardized Access/Disclosure (SSAD) adopted in 2021 to reflect lessons learned and Community input from operations of the Registration Data Request Service (RDRS) to date;
- Expected progress of the implementation of the Privacy/Proxy Services Accreditation Policy Recommendations (PPSA) in the coming year.

Objective of the Informational Session on Accuracy of Registration Data

In the ICANN85 Mumbai Communiqué, the GAC expressed its strong interest in engaging further with the Board and the Contracted Parties on how to address – in a swift and effective manner – the current 15-day timeline for registrars to validate and verify registrants contact information.

This session aims to inform GAC Members on the background of this timeline, how it may be exploited for DNS Abuse purposes, what would be the operational implication of changing this timeline or the verification process, and possible path for implementing such changes. It is expected that this informational session will prepare the GAC for the eventual trilateral dialogue between the GAC, the ICANN Board and the GNSO Council which the GAC Chair initially requested be convened on this issue prior to ICANN86, and which is now expected to take place after the Seville ICANN86 Policy Forum.

Leadership Proposal for GAC Action

1. **Assess progress on the development of law enforcement requestor authentication mechanisms**, in collaboration with ICANN org and community representatives, **as a dependency to ensuring that the 24-hour response timeline becomes enforceable** on all gTLD Registries and Registrars as soon as possible, following its recent publication of the updated [Registration Data Policy](#) as as part of ICANN [Consensus Policies](#).
2. **Consider discussions of the future of the 2020 policy recommendations for a System for Standardized Access/Disclosure (SSAD)** in the recently convened GNSO SSAD Supplemental Recommendations Team (SRT), in light of:
 - a. [GAC Comments](#) (29 Sept. 2025) on the [RDRS Standing Committee Report](#) (19 August 2025) including the GAC recognition *“that the original package of EPDP Phase 2 recommendations may benefit from revision in light of RDRS findings [...]”* but concerns *“that a blanket rejection of the recommendations may carry unwarranted risk by calling into question the future of all the SSAD-related recommendations [...]”*
 - b. The ICANN Board [resolution](#) (30 October 2025) on the continuation of the RDRS for up to 2 years *“while the community continues its deliberations regarding the future of the service and related policy recommendations”,* urging *“the GNSO Council to ensure that future policy work on the System for Standardized Access/Disclosure (SSAD) recommendations is aligned with policies related to requests for underlying registration data for domains registered under privacy and proxy services, an enforceable timeline for urgent requests, and other relevant procedures.”*
 - c. [GAC Comments](#) (15 December 2025) on the [ICANN org RDRS Policy Alignment Analysis](#) in which the GAC expressed support for the proposed enhancements of RDRS which it considers shared goals with the ICANN Board, including:
 - i. Mandatory registrar participation, as presumed under most adopted consensus policies;
 - ii. A requirement for registrars with affiliated privacy and proxy services to also respond to RDRS requests for underlying privacy/proxy customer contact data as part of their disclosure decision process;
 - iii. Better integration for registrars’ systems and requestors’ systems with the request portal;
 - iv. Operational options for country code top-level domains (ccTLDs) to voluntarily participate in the RDRS or a successor system
 - d. A [summary of the GNSO SSAD Policy Recommendations](#) provided to the GAC by the GNSO Council (see in Annex to this briefing)
 - e. The [assignment](#) of the newly convened SSAD Supplemental Recommendations Team

3. **Consider progress made, and expected to be made in 2026, in the implementation of the Privacy/Proxy Services Accreditation (PPSAI) Policy Recommendations** which aim to create a framework to standardize business practices including regarding disclosure of underlying registration data when such services are involved in domain name registration.
4. **Examine possible paths for progress on accuracy of registration data** in gTLDs in a future trilateral dialogue with the ICANN Board and GNSO Council, following the expected ICANN86 informational session on this matter, in light of [recommendations](#) (31 July 2025) of the [GNSO Small Team on Registration Data Accuracy](#) (which were adopted by the GNSO Council following previous [GAC Input](#) on a set of “threshold questions”) including “examining the existing process for validating and verifying registration data under the 2024 Registrar Accreditation agreement” which is identified by the [Final Issue Report on a PDP on DNS Abuse Mitigation](#) (4 December 2025) as a potential way to reduce DNS Abuse significantly by increasing the effectiveness and timeliness of these verifications. In the [GAC Dublin Communiqué](#) (3 November 2025) and the [GAC Mumbai Communiqué](#) (16 March 2026), the GAC:
 - a. Recommended that registrars be required validation and verification of registration data before a newly registered domain name can become accessible through the DNS,
 - b. Encouraged ICANN org undertake a holistic assessments of the evolution of technologies and registration practices that may affect the accuracy and reliability of domain registration data,
 - c. Called for the ICANN community to maintain an active forum in which to continue discussing possible next steps related to accuracy.
 - d. Proposed that a possible path to be further explored in this regard is contract amendments, and the GAC will continue to consider the best path for efficient implementation.

Current Status and Recent Developments

This section is subdivided to address the following topics

- The Registration Data Request Service (RDRS) - **pp. 5-6**
- Feasibility of a permanent System for Standardized Access/Disclosure of Registration Data (SSAD) - **pp. 7-10**
- The Registration Data Policy - **pp. 11-12**
- Urgent Requests for disclosure of Registration Data - **pp. 13-15**
- Privacy/Proxy Services Accreditation (PPSAI) Policy Implementation - **pp. 16-18**
- GNSO work on Accuracy of Registration Data - **pp. 19-24**
- Reminder on the status of other policy issues, policy development and policy implementation processes pending further consideration, including:
 - Policy Development in Phase 2 of the EPDP on Registration Data - **p. 25**
 - Policy Development in Phase 2A of the EPDP to address the issues of legal vs. natural persons and the feasibility of unique contacts - **p. 26**
 - Publication of Reseller information in domain registration data - **pp. 27-29**

- **The Registration Data Request Service (RDRS)**, which launched on 28 November 2023 as a **proof of concept or pilot program** aimed to *“simplify the process for submitting and receiving requests for nonpublic gTLD registration data for both the requestors and contracted parties”* and to inform further consultations on the feasibility of a permanent System for Standardized Access/Disclosure of Registration Data (SSAD). The RDRS has enabled the collection and reporting on more than 2 years of usage data¹. **The GAC has consistently called “for measures to ensure the ultimate result is progress toward the ICANN Board’s previously expressed goals, including making RDRS participation mandatory for all gTLD registrar and continuing RDRS operation past its pilot period “until missing policy elements are in place”**
 - In the [ICANN82 GAC Seattle Communiqué](#) (17 March 2025), **the GAC** expressed the view that there is *“substantial room for the RDRS to generate additional value, including for requestor communities, especially if the system can be adequately enhanced based on users’ feedback and usage metric reports.”*
The GAC recalled its recommendations that RDRS participation be made mandatory for all gTLD registrars; that the system should provide underlying data for privacy and proxy registrations; that the RDRS should incorporate APIs to better facilitate RDRS usage by requestors and registrars and to make it ready to incorporate future authentication solutions for law enforcement; and invited the ICANN Board and the ccNSO to explore ways to overcome the existing challenges to allow the voluntary participation of ccTLDs in the system.
 - In the [ICANN83 GAC Prague Communiqué](#) (16 June 2025), the GAC The GAC expressed its *“concerns regarding the reduced use of the tool in light of the departure of certain registrars from the pilot and reiterates its recommendation that RDRS participation should be made mandatory for all gTLD registrars to increase its utility”*. The GAC renewed *“its call for the RDRS to continue operating beyond its pilot period and for enhancements to be made to the RDRS as previously identified by both the ICANN Board and the GAC”*. The GAC also welcomed *“the Board’s comment during ICANN83 that ICANN is developing an analysis of which envisioned enhancements to the RDRS would require new policy development and which ones could be completed based on existing recommendations or policies.”*
 - In response to the [Public Comment proceeding](#) on the [RDRS Standing Committee Report](#) (19 August 2025), the [GAC submitted Comments](#) (29 Sept. 2025) in **support of most of the RDRS Standing Committee recommendations to the GNSO Council**, including:
 - Rec. 1: Continue the RDRS beyond the pilot period.
 - Rec. 2: Allow for authentication of interested requestor groups, beginning with law enforcement.

¹ See monthly Registration Data Request Service Usage Metrics since the launch of the service, available at <https://www.icann.org/rdrs-en>. Since November 2024, ICANN org has started reporting on two new metrics which provide a breakdown of disclosure requests by country or processing jurisdiction and by requestor type, see for instance p.26 and p.31 of the [February 2025 RDRS Usage Metrics Report](#).

- Rec. 3: Implement Key System Enhancements to sustain and evolve RDRS post-pilot while more policy work is underway.
- Rec. 4: Consider further policy work in specific areas such as privacy/proxy data and the inclusion of RDRS links in RDAP responses
- Rec. 6: Maintain the current Standing Committee with narrowed Scope.
- On 30 October 2025, the ICANN Board [resolved](#) to:
 - ***continue operations of the RDRS for a period of up to two years, until December 2027, while the community continues its deliberations regarding the future of the service and related policy recommendations.***
 - ***continue to engage with the GNSO Council and the GNSO Standing Committee on any further enhancements to the service during this period.***
- In the [GAC Dublin Communiqué](#) (3 November 2025), the GAC called for “***efforts to ensure adequate and timely improvements to the RDRS to reassure the community that it can evolve into such a permanent, centralized, and globally accessible mechanism. The absence of an adequate centralized system creates inefficiencies, as requestors such as law enforcement agencies would need to approach each registrar independently***”
- The GNSO Council [resolved](#) (11 December 2025) to “***accept[s] the RDRS SC Findings Report [Final RDRS Standing Committee Report, 10 November 2025] as helpful empirical input to inform future deliberations within the GNSO regarding the next steps on the EPDP Phase 2 SSAD Recommendations [...]***”

- **Feasibility of a permanent System for Standardized Access/Disclosure of Registration Data (SSAD) has been focusing on assessing the operations of the Registration Data Request Service (RDRS), following the [GNSO's request for an SSAD proof of concept](#) (27 April 2022) on the basis of an ICANN org [Design Paper](#) (13 Sep. 2022) and consistent with [updates](#) (7 Nov. 2022) [suggested](#) by the GNSO Council to the ICANN Board (17 Nov. 2022). The GNSO Council has now **started**, following the “non-adoption” the ICANN Board of the original GNSO EPDP Phase 2 SSAD Recommendations, **to deliberate on modification of the original SSAD recommendations**, consistent with [Recommendations from the GNSO RDRS Standing Committee](#) (10 November 2025) and ICANN org's [RDRS Policy Alignment Analysis](#) (30 October 2025), as [urged](#) to so by the ICANN Board (30 October 2025).**
 - The GNSO [resolution](#) on the EPDP Phase 2 Final Report (24 September 2020) **adopted the 18 recommendations that seek to establish an SSAD, requesting a consultation with the ICANN Board prior to its consideration of the policy recommendations to discuss “questions surrounding the financial sustainability of SSAD and some of the concerns expressed within the different minority statements”** including in the [GAC Minority Statement](#) (24 August 2020).
 - Prior to considering the GNSO's SSAD Policy Recommendations, **the ICANN Board [launched](#) (25 March 2021) an Operational Design Phase (ODP) [to perform an assessment](#)** of possible implementation parameters. A GNSO Small Team reviewed ICANN org's resulting [Operational Design Assessment](#) (25 Jan. 2022) in support of the GNSO Council's consultation with the ICANN Board and consideration of questions and concerns expressed in a [Board letter](#) (24 Jan. 2022).
 - In a [letter to the ICANN Board](#) (27 April 2022), **the GNSO shared concerns with ICANN's Operational Design Assessment** and called for a pause of the Board's consideration of the SSAD recommendations to allow for work to continue on a “proof of concept”, in collaboration with ICANN org, who suggested it could propose a simplified “SSAD Light Design” in a [Concept Paper](#) (6 April 2022)². The **ICANN Board [confirmed](#) (9 June 2022) its agreement and decision to pause the consideration of the policy recommendations.**
 - In the [The Hague Communiqué](#) (20 June 2022), while looking forward to the “*timely completion of the ‘proof of concept’*”, the GAC emphasized “*the importance of providing specific timelines and goals*” for this work and clarifying “*what will happen after the ‘proof of concept’ phase concludes*”.
 - The **GNSO Council** adopted the [addendum](#) (7 Nov. 2022) to the SSAD ODA Small Team [Preliminary Report](#) (4 April 2022) and expressed being “**supportive of the request that the ICANN Board proceeds with the implementation of the Whois Disclosure System**” in the [GNSO Chair letter to ICANN Board Chair](#) (17 Nov. 2022) consistent with ICANN org's [WHOIS Disclosure System Design Paper](#) (13 Sep. 2022)

² The approach proposed by ICANN org in the SSAD Light Concept Paper was presented to the GAC during the [Pre-ICANN74 ICANN org's briefing to the GAC](#) on 31 May 2022 (GAC website login required)

- On 27 February 2023, the ICANN Board [resolved](#) to launch the implementation of the **WHOIS Disclosure System, or “Registration Data Request Service”** per the associated [announcement](#) (2 March 2023).
- In the [Washington D.C. Communiqué](#) (20 June 2023), the GAC noted **“the importance of maximizing voluntary participation in the system, including through effective outreach and potential incentive structures”** and stressed **“the importance of providing users of the RDRS with easy to access step-by-step training, and guidance”**.
- In the [ICANN Board Comments on the Issues of Importance in the Washington D.C. Communiqué](#) (18 September 2023), the ICANN Board shared **“the same sentiment as the GAC on the importance of maximizing the participation of the users, both from ICANN-accredited registrars and requestors”**. It noted **“that ICANN org has been conducting its various engagement and outreach efforts and will continue to do so up until and beyond the launch of the service”**.
- In the [GAC Hamburg Communiqué](#) (30 October 2023), the GAC recalled that the ICANN Board **“urged the GNSO Council to consider a Policy Development Process or other means to require registrars to use the RDRS”**³ and reaffirmed that the GAC **“remains supportive of this idea”**. Observing that **“the RDRS’s success depends in part on how satisfied users are with the system”**, the GAC stressed that a success factor will be **“whether users submitting legitimate requests receive data relating to the underlying registrant as opposed to information related to a privacy or proxy service”**, a risk noted by ICANN in its Operational Design Assessment of the SSAD⁴.
- In the [GAC San Juan Communiqué](#) (11 March 2024), the GAC reiterated that **“widespread use of the pilot by both registrars and requestors will help the RDRS meet its intended purpose”** and stated **“[t]he GAC believes all contracted registrars should participate.”**, encouraging **“ICANN org to conduct a survey of registrars who are not currently participating in the RDRS to gain insights into the concerns of these parties and potential challenges that could be addressed”**. Stressing **“the importance of continued outreach efforts throughout the lifespan of the RDRS to ensure both requestors and registrars are aware of the uses and limits of this pilot program as well as its intended purpose”**, the GAC highlighted **“potential improvements that could help the pilot meet its intended purpose and create an improved user experience”** such as **“unnecessary and confusing elements of the current requester interface, particularly with respect to requests from law enforcement and the applicability of various data protection frameworks”**.
- In the [GAC Kigali Communiqué](#) (17 June 2024) the GAC found that **“the usage of the tool could be further increased, and that the metrics have already shed light on potential improvements that could help the service meet its intended purpose”**, recalled that **“several suggestions for improvement were already formulated in the San Juan Communiqué and stands ready to continue its work on the RDRS Standing Committee to address challenges and maximize the utility of the system for both requestors and**

³ see [ICANN Board Resolution on WHOIS Disclosure System Implementation](#) (27 February 2023)

⁴ SSAD Operational Design Assessment (25 January 2022) at pp.19-20

registrars". The GAC reiterated *"the importance of the continued promotion of and education about RDRS to **ensure the community, including both requestors and registrars, are aware of the uses and limits of this pilot program**, as well as its intended purpose, to inform work toward an eventual Standardized System for Access and Disclosure (SSAD)" including by "providing a link to the RDRS via the ICANN registration data lookup tool could help in reaching potential RDRS users who may not be aware of the pilot". The GAC also encouraged "registrars to consider making disclosure decisions in response to RDRS requests on behalf of their affiliated proxy service provider" where a registrar uses an affiliated proxy service provider.*

- In the [ICANN Board Comments on Issues of Importance in the GAC Kigali Communiqué](#) (15 October 2024), **the ICANN Board noted that "information on the RDRS has been linked on ICANN's Registration Data Look Up Tool in the section on non-public registration data to increase visibility. A link to RDRS is also included on the results page for the look up tool as well". Additionally the ICANN Board stated that "Information and links to the RDRS can be added in the RDAP output of registries and registrars via the GNSO policy development process. The Board encourages the GAC to discuss this option with the GNSO Council"**
- In the [GAC Istanbul Communiqué](#) (18 November 2024) **the GAC reiterated its support for continued operation of the RDRS**, for promoting awareness and usage of the service, implementing improvements to its interface, and to include a link to it within WHOIS/RDAP systems. The GAC also welcomed further work on facilitating voluntary participation of ccTLD managers in RDRS given the significant interest of RDRS users in registration data of ccTLD domain names.
- In addition to the [ICANN Board Comments on Issues of Importance in the GAC Istanbul Communiqué](#) (29 January 2025), following discussions in the January 2025 Board Workshop, and awaiting the GNSO Standing Committee's future report on the RDRS Pilot, **views of the ICANN Board on the future of RDRS were shared with the GAC and the RDRS Standing Committee** (10 February 2025) **noting** that: a lot has been learned from the RDRS Pilot to date and it is not clear that there is much more to be learned; **the RDRS is a useful tool that should continue to be up and running with some changes** such as: participation by all registrars, Integration of (affiliated) privacy/proxy services into the system, development of requestor authentication mechanisms where appropriate (in particular for law enforcement) and allowing voluntary participation by ccTLDs; **these changes could be informed by policy that is either already available (including EPDP Phase 2 SSAD) or that may need to be developed.**
- Over the first semester of 2025, the [GNSO RDRS Standing Committee](#) has been drafting its Final Report consistent with its 4 assignments as laid out in its [Charter](#) (8 Sept. 2023). This report was aimed to assist the GNSO Council in its pending consultation with the ICANN Board on the future of the EPDP Phase 2 SSAD recommendations, including whether they should be adopted, rejected, or potentially modified.

- In response to **Recommendation 5** of the Preliminary [RDRS Standing Committee Report](#) (19 August 2025) regarding next steps on EPDP Phase 2/SSAD Policy Recommendations, the [GAC Comments](#) (29 Sept. 2025) recognized *“that **the original package of EPDP Phase 2 recommendations may benefit from revision in light of RDRS findings [...]**”* but expressed concerns *“that a blanket rejection of the recommendations may carry unwarranted risk by calling into question the future of all the SSAD-related recommendations [...]*”
- As part of its [resolutions](#) (30 October 2025) to continue operations of the RDRS for a period of up to two years, **the ICANN Board also urged the GNSO Council:**
 - **To ensure that future policy work on the SSAD recommendations is aligned with policies related to requests for underlying registration data** for domains registered under privacy and proxy services, an **enforceable timeline for urgent requests**, and other relevant procedures.
 - To consider the [RDRS Policy Alignment Analysis](#) (30 October 2025) in its future consultation with the ICANN Board on the EPDP Phase 2 policy recommendations.
- [GAC Comments](#) (15 December 2025) on the [ICANN org RDRS Policy Alignment Analysis](#) laid out the **GAC expectations, that modification of the EPDP Phase 2 SSAD recommendations to achieve the expected improvements shared between the ICANN Board and GAC be done swiftly** and that *“[s]hould the GNSO ultimately not deem it feasible to utilize the policy paths identified within this document to achieve these goals, the GAC would anticipate and support the pursuit of these goals by other means, which could include but may not be limited to new policy development processes or contract amendments”*
- During ICANN85, **the ICANN Board and GNSO Council were expected to take the necessary steps to launch the process** described in the [ICANN Bylaws, Annex A](#), Sec. 9 **which provides for possible modification of GNSO Policy Recommendations** (Supplemental Recommendations). This [process](#) was discussed in the GNSO Council in January 2026 and an initial dialogue with members of the ICANN Board took place in the GNSO Council meeting on Thursday 12 February (see [Agenda](#) Item 5). Eventually, the ICANN Board [resolved](#) to not adopt the original SSAD Recommendations (12 March 2026).
- Prior to ICANN86, the GNSO convened a [SSAD Supplemental Recommendations Team](#) (SRT) **including two GAC representatives from the GAC Small Group on Registration Data: David Bedard (Canada) and Owen Fletcher (United States)**. The group is expected, according to its [GNSO Council Assignment](#), to propose modifications to the original 18 SSAD recommendations “based on the recommendation rationale provided in the [\[RDRS\] Standing Committee’s Final Findings Report](#)” **by February 2027**.
- During ICANN86, the SSAD SRT is expected to meet for a full day on Sunday 7 June and then in three sessions on [Monday 8](#), [Wednesday 10](#) and [Thursday 11 June](#).

- **The policy foundation of a new Registration Data Policy regime**, the [Registration Data Policy](#) (21 February 2024) became effective on 20 August 2025, **with the exception of provisions related to the timeline for response to Urgent Requests**, for which the Implementation Review Team (IRT) was recently reconvened (see next section on p.11).
 - This Consensus Policy **will become part of ICANN’s contractual requirements for Registries and Registrars within 18 months of its adoption** and replace the current [Interim Registration Data Policy for gTLD](#) (20 May 2019) which currently requires Contracted Parties to continue to implement measures that are consistent with the [Temporary Specification](#) (20 May 2018). **It introduces changes to existing ICANN Policies** which rely on, or relate to Registration Data, including the superseding of the Thick WHOIS transition Policy and revisions of the implementation of the Registration Data Access Protocol (RDAP).
 - **The GAC provided input** at several stages leading to the adoption of this policy:
 - [Input to the ICANN Board](#) (24 April 2019) before its consideration of the GNSO Policy Recommendations from EPDP Phase 1, in which the GAC deemed the *“recommendations to be a sufficient basis for the ICANN Community and organization to proceed - with all due urgency - to the completion of a comprehensive WHOIS model covering the entirety of the data processing cycle, from collection to disclosure, including accreditation and authentication, which would restore consistent and timely access to non-public registration data for legitimate third party interests, in compliance with the GDPR and other data protection and privacy laws”*.
 - Advice to the ICANN Board in the [Montréal Communiqué](#) (6 November 2019), to *“ensure that the current system that requires ‘reasonable access’ to non-public domain name registration is operating effectively”* ([accepted](#) by the ICANN Board on 26 January 2020) and *“to ensure that the ICANN org and the EPDP Phase 1 Implementation Review team generate a detailed work plan identifying an updated realistic schedule to complete its work”*, which were the subject of follow up in the GAC Communiqués of [ICANN70](#), [ICANN71](#), [ICANN72](#), and [ICANN73](#) and related interactions with the ICANN Board⁵.
 - In the latest [GAC Comments](#) (21 November 2022), **the GAC expressed public policy concerns with the proposed Draft Registration Data Consensus Policy for gTLD** including: definition and proposed timelines to respond to urgent requests; collection and publication of reseller data; collection/publication of registration information related to legal entities; need for clear standards around implementation and enforcement; and implementation of a partial system resulting in a policy gap. **The GAC recalled these concerns** in the [Cancún Communiqué](#) (20 March 2023) and in the [Seattle Communiqué](#) (17 March 2025)⁶.

⁵ See Board GAC Advice Scorecards related to each Communiqué at: <https://gac.icann.org/activity/icann-action-request-registry-of-gac-advice>

⁶ See Issues of Importance to the GAC, Section IV.3 pp.7-8 and Section IV.1.d pp.8-9 respectively.

- Based on consideration of input received from 14 community groups, **ICANN org updated the Draft Consensus Policy Language to reflect its analysis of Public Comments** (see [redline version](#) circulated to the IRT on 4 May 2023). ICANN org also provided [responses to public comments](#) (28 April 2023), which discussed some of the GAC input:
 - Regarding the timeline for response to Urgent Requests ICANN’s Implementation Project Team (IPT) *“believes that the 24-hour response time accurately reflects the intent of the EPDP policy recommendations”* (see p.44 of Addendum and section 10.6 of updated consensus policy), but did not extend the definition of urgent requests to include “imminent or ongoing cybersecurity incidents”
 - Regarding the collection and publication of reseller data, *“the IPT believes that making any recommended changes is beyond the scope of the policy as it would create additional changes that are not required by the EPDP Phase 1 recommendations.”*
 - Regarding the policy’s impact on Thick WHOIS, *“The IPT, in consultation with the Implementation Review Team, concluded that ICANN org could enforce a transfer requirement only if the relevant contracted parties agree that a legal basis exists for the transfer and a data protection agreement is in place”*
 - Regarding the Phase 1/Phase 2A policy gap, ICANN org reached out to the GAC Small Group on WHOIS/EPDP with a [memo](#) (5 May 2023) which clarified that:
 - *The functionality of distinguishing between legal and natural persons is beyond the scope of the EPDP Phase 1 IRT*
 - *During the EPDP Phase 2A deliberations, the EPDP Phase 2A Working Group made a policy decision not to mandate the contracted parties to change their practices with regard to data of legal and natural persons*
- In the [GAC Hamburg Communiqué](#) (30 October 2023), the GAC expressed support for the *“Board to separate the topic of Urgent Requests from the publication of the overarching Registration Data Consensus Policy for gTLDs”*
- On 21 February 2024, ICANN published the [Registration Data Policy](#), an ICANN Consensus Policy that describes requirements for Processing Registration Data for each ICANN-accredited Registrar and gTLD Registry Operator. Its effective date is 21 August 2025. In the meantime, the [Interim Registration Data Policy for gTLD](#) (20 May 2019) will remain in effect until 20 August 2025. During the period of 21 August 2024 through 20 August 2025, Registries and Registrars may continue to implement measures consistent with the [Temporary Specification for gTLD Registration Data](#) (20 May 2018) or the new Registration Data Policy in its entirety, or elements of both.

- **Agreeing on a timeline for response to Urgent Requests for disclosure of registration data** in “circumstances that pose an imminent threat to life, serious bodily injury, critical infrastructure, or child exploitation” **proved unattainable** in the policy implementation process. **Agreement was eventually reached on a 24-hour response timeline, while work continues** in the context of a trilateral dialogue between the GAC, the ICANN Board and the GNSO, on the development of authenticate law enforcement requestors, and which were established.
 - At the conclusion of the policy implementation process (August 2023), **ICANN org was planning to publish the proposed [Final Registration Data Consensus Policy](#)** with a time frame for response to Urgent request “*without undue delay, generally within 24 hours*” allowing 2 extensions for a total response time of up to 3 business days.
 - In the [GAC Washington D.C. Communiqué](#) (20 June 2023) the GAC took “*note of ICANN’s summary of public comments on Phase 1 implementation and supports the Implementation Project Team’s suggestion, in line with the GAC’s public comment, to reduce the timeline for urgent requests to twenty-four hours.*”
 - In a [GAC Chair letter to the ICANN Board](#) (23 August 2023), the **GAC expressed its public policy concern with the proposal, and requested the ICANN Board “carefully review the proposed implementation of this particular issue and consider next steps that would achieve an outcome that better meets the public safety considerations posed by urgent requests”**. The GAC also:
 - Observed “*the **tension between the proposed implementation and the concerns conveyed by the GAC during the public comment process**. In this regard, we note ICANN’s commitment to ‘seeking input from the public, for whose benefit ICANN in all events shall act’.*” ([ICANN Bylaws](#), Section 1.2(a)(iv) Commitments)
 - Stressed its belief that **the proposal “is not ready for publication and should be considered further”** while “*the balance of the implementation of the Consensus Policy should move forward*”
 - Highlighted its concerns that “*[t]his outcome calls the effectiveness of the public comment process into question and raises further questions about the interplay between the IRT and the IPT and whether all views, including those put forth by the GAC, have been adequately addressed*”
 - During the [GAC/Board BGIG call](#) (20 September 2023) [GAC website login required] the ICANN Board indicated that it questioned whether the proposal is fit for purpose and consistent with the [ICANN Board Comments on the Issues of Importance in the Washington D.C. Communiqué](#) (18 September):
 - [...] *The Board understands that for most cases of an urgent nature, law enforcement or other parties seeking registration data rely on existing channels including direct contacts with the relevant registry operator and/or registrar. The Board further understands that this may not be possible in all cases, and the policy requirement on responses to urgent requests is to provide a “ceiling” so that when this process is relied upon, these responses have maximum time constraints..*

- ***The Board would be interested in any data the GAC can provide as to experiences of its members in working with contracted parties on requests of an urgent nature, including the channels used and timing for responses provided. [...]***
- **The SSAC, also concerned by these developments, published SAC122, a [Report on Urgent Requests in the gTLD Registration Data Policy](#) (12 Dec. 2023) in which the Security and Stability Advisory Committee noted being “*struck by the incompatibility between the definition of Urgent Requests [imminent threat to life] and the required response times [without undue delay, generally within 24 hours of receipt]” when “the expected response time [in such situations] is measured in minutes”.* SSAC recommends that the policy be substantially reconsidered to become fit for purpose and that, in the meantime, ICANN gathers and shares data about Urgent Requests, including their frequency of Urgent Requests and registry/registrar practices in responding to them.**
- The [ICANN Board responded to the GAC Chair letter of 23 August 2023](#) (11 Feb. 2024), as well as [to the Registrar Stakeholder Group Chair](#) who [had commented on the GAC letter to the ICANN Board](#) (8 Sep. 2023) noting that “*the Board concluded that it is necessary to revisit Policy Recommendation 18 concerning urgent requests [...] and the manner in which such emergencies are currently handled*” and indicating that “*[f]or this, we believe that consultation with the GNSO Council is required*”.
- In the [GAC Hamburg Communiqué](#) (30 October 2023), “*[b]ecause of the vital public safety interest implicated by Urgent Requests*”, the GAC emphasized “*the need to commence and conclude this implementation work as soon as possible*”, noting further that “*this work should include accreditation issues, among others*”.
- In the [GAC ICANN79 San Juan Communiqué](#) (11 March 2024), **the GAC advised the ICANN Board “to act expeditiously to establish a clear process and a timeline for the delivery of a policy on Urgent Requests for domain name registration data, to respond to the vital public safety interests related to such requests. Such a process must ensure appropriate participation of the community, including the GAC.”** In its [response](#) (5 May 2024) **the ICANN Board determined to “defer[s] action on this advice, noting that it plans to discuss the way forward on this issue with the GNSO Council.”**
- In the [GAC ICANN80 Kigali Communiqué](#) (17 June 2024), **the GAC Followed-up on this Advice and urged “the GNSO Council and the Board to take any necessary steps in an expeditious manner to ‘establish a clear process and a timeline for the delivery of a policy on Urgent Requests for domain name registration data’, given the vital public safety interests related to such requests.”** In response, the ICANN Board determined to continue deferring action on this Advice noting its [correspondence with the GNSO Council](#) and an expected future meeting on this matter between the GAC, PSWG, the ICANN Board and the GNSO.
- In a [follow-up letter to the ICANN Board](#) (15 October 2024), **the GAC Chair proposed to the ICANN Board that two tracks of work be conducted in parallel** to both explore possible mechanisms to authenticate emergency law enforcement requestors and determine an appropriate response time for authenticated Urgent Requests.

- Following subsequent correspondence from the [GNSO Council to the GAC](#) (15 January 2025) and a [trilateral call between the GAC, the ICANN Board and the GNSO Council](#) (12 February 2025), an **agreement was reached among the three parties** that:
 - **The EPDP Phase 1 IRT would be reconvened** to work on defining an appropriate timeline for response to Urgent Requests
 - **A group of practitioners would be convened by the GAC PWSG Co-Chairs** to work on defining mechanisms to authenticate law enforcement requests.
- On 20 February 2025, **the Practitioners Group on Law Enforcement Authentication**, composed of representatives from the GAC, the GNSO and several law enforcement agencies including Interpol, Europol and the FBI, held its inaugural meeting and met several times since. It is expected to meet generally every two weeks and to report on its progress to the GAC, the ICANN Board and the GNSO Council regularly. To date, participants in this group have discussed both a short term and a long term mechanism to provide this authentication for the benefits of Contracted Parties, through existing ICANN systems, the feasibility of which is being considered by ICANN org.
- On 23 April 2025, **the Registration Data Policy Implementation Review Team (IRT) was reconvened**. Considering ICANN Board guidance in an [earlier correspondence to the GNSO Council](#) (3 June 2024) that *“the proposed timeline - whether one, two, or three business days - does not appear to be fit for purpose. To respond to truly imminent threats, a much shorter response timeline, i.e., minutes or hours rather than days, would seem to be more appropriate”*, ICANN advanced a proposal that Contracted Parties respond to Urgent Requests from authenticated law enforcement requestors within 24 hours.
- Shortly before ICANN84, ICANN org published for [Public Comment](#) the proposed [Consensus Policy language](#) (22 October 2025) **requiring that Contracted Parties respond to the Urgent Request without undue delay, not to exceed 24 hours**, and 72 hours in exceptional circumstances.
- In its [Comments](#) (15 December 2025) on this proposal, the GAC recalled the [ICANN84 GAC Dublin Communiqué](#) (3 November 2025) which noted that *“the current proposal for a 24-hour timeline to address Urgent Requests, with potential extension to 72 hours in cases of force majeure, is in line with previous positions expressed by the GAC and the ICANN Board”*
- The [report of public comments](#) (14 January 2026) did not confirm whether the proposed policy language was final, nor did it determine among several possibilities, what would be the process steps and time frame required by ICANN org to make the envisioned Law Enforcement Authentication Mechanisms available to Contracted Parties, thus enabling the enforcement of the 24 hour response time.
- On 12 May 2026, ICANN published the updated [Registration Data Policy](#) as part of ICANN [Consensus Policies](#) to include the 24-hour expedited response timeline for Urgent Requests, noting that the effective date for this requirement will be determined following finalization of the authentication mechanism for requestors.

- **Privacy/Proxy Services Accreditation (PPSAI) Policy Implementation** has returned to the fore in light of emerging challenges with these services, now being provided by default to registrants by many leading registrars⁷ and following the reconvening of an Implementation Review Team (IRT) that had been suspended since 2018. According to a recently published [Implementation Plan](#) (8 January 2026). It is expected that the IRT prepares and publishes a Draft Consensus Policy and associated Disclosure Frameworks by the end of 2026. It is currently discussing possible accreditation models
 - Since the entry into force of GDPR and ICANN's Temporary Specification in May 2018, the PPSAI Implementation remained on hold with ICANN org planning to *"allocate resources and finalize a timeline to continue the implementation of PPSAI once the implementation of EPDP Phase 1 is finalized and the design criteria of the EPDP Phase 2 SSAD and Whois Disclosure System are sufficiently stable so that org and the community can identify what synergies can be leveraged with these projects and the PPSAI implementation."*
 - As part of EPDP Phase 1 Implementation, in the so called [Recommendation 27 Registration Data Policy Impacts Wave 1.5 Report](#) (23 February 2021), ICANN org conducted **in-depth analysis of the substantial impact of the Registration Data Policy requirements on the PPSAI recommendations**, and invited the GNSO to consider whether updates of the latter are needed.
 - In the [GAC Comments](#) (16 November 2022) on the [proposed RDAP and Bulk Registration Data Access \(BRDA\) Contractual Amendments](#) the GAC argued that *"commercial proxy services" may need "their own data element or entity role" in RDAP responses, "in recognition of the purposes of the RDDS system and the evolving domain name industry"* and the need to include *"all entities inherent to the registrar's domain name registration data distribution channel"*, when they exist, in RDAP query responses.
 - In the [Report of Public Comments](#) (16 December 2022), ICANN org acknowledged the GAC's input, noting that:
 - *The proposed RDAP Profile enables the publication of data elements of which the reseller is included.*
 - *ICANN org will continue to work with the ICANN community to identify how roles and entities are represented in RDDS as part of the policy development process and will work with the contracted parties to update the respective agreements as policies require*
 - *Issues specific to privacy and proxy services will be managed via the implementation of privacy proxy policy recommendations*
 - In the [Cancún Communiqué](#) (20 March 2023) **the GAC advised the ICANN Board:**
 - i. *To prioritize the assessment related to the pending RDS-WHOIS2 Review Recommendation R10.1 which called for the Board to monitor the implementation of the PPSAI policy recommendations, and all necessary steps to resume this implementation, consistent with the intent of the GAC's previous advice.*

⁷ As recognized by the GAC in the Hamburg Communiqué (30 October 2023)

ii. *To regularly update the GAC on the status of activities related to privacy and proxy services.*

- This advice was discussed during the [Board/GAC Clarification call](#) (11 April 2023) and eventually accepted by the ICANN Board as reported in the [Scorecard of Board Action](#) regarding the Cancún Communiqué (15 May 2023) which noted, at it relates to (i), that *“the assessment is in progress within the org”*.
- In the meantime, the [ICANN Specific Reviews Q1 2023 Quarterly Report](#) (31 March 2023) clarified that *“Recommendation 10.1 aims to provide better data quality and contactability of the underlying contact owner for registrations using affiliated Privacy or Proxy services by requiring registrars to verify and validate the underlying registration data of domain name registrations.”* and stated:
 - *Following further review, the 2013 Registrar Accreditation Agreement (RAA) already includes requirements for registrars to validate and verify registrant contact data of privacy services.*
 - ***ICANN org plans to resume the implementation of Privacy and Proxy Services Accreditation Implementation (PPSAI), which will provide additional explicit requirements to verify and validate registrant contact data of both Privacy and Proxy Services, once the EPDP Phase 1 implementation is completed.***
- In preparation for ICANN78, ICANN org [reported](#) (6 October 2023) considering when and how the implementation work could resume, and invited interested stakeholders for an informal conversation on open questions and options for proceeding. ICANN org further indicated planning to allocate resources to this project once the EPDP Phase 1 implementation is complete.⁸
- During **informal meetings of interested stakeholders during ICANN78 and ICANN79**, stakeholders discussed the possible need to reconsider the [original GNSO Policy Recommendations](#) (7 December 2015) and the ensuing implementation approach (suspended in 2018) in light of the substantial evolution of data protection law, industry practices and tools. To this end ICANN org presented further analysis [assessing the PPSAI policy recommendations according to an estimated difficulty or level of effort](#) (2 March 2024).
- Since the [call for volunteers](#) (20 May 2024) to reconvene an Implementation Review Team to assist ICANN is assessing the path forward. This work resulted in the formulation and discussion of an [Accreditation Models Paper](#) (12 May 2025) and [“threshold questions” and requests for guidance from the GNSO Council](#) (30 July 2025).
- A [dedicated GNSO Small Team](#) was formed in August 2025 to assist in the formulation and eventual issuance of [GNSO Council Responses and Guidance](#) (13 November 2025) to the Implementation Review Team

⁸ See p.20 in slides of the GDS update to the GNSO Council (22 October 2023)

- ICANN org resumed [regular IRT meetings](#) on 8 January 2026. On 23 January 2026, ICANN org, with input from the IRT, published an [Implementation Plan](#) and [Work Breakdown](#) to guide the development and deployment of a PPSAI Consensus Policy and the related Disclosure Frameworks. ICANN org is currently working with the IRT on the development of a Draft PPSAI Consensus Policy and Disclosure Frameworks, including reviewing the GNSO guidance received on possible Accreditation Models (see [slides](#) of the [IRT meeting on 22 January 2026](#))
- During ICANN85, the GAC was briefed by ICANN org on the reconvening of the IRT since 2024 and its clearing a number of procedural steps which sought to clarify interpretation of the 2016 GNSO policy recommendations adopted by the ICANN Board in light of ICANN policy and Data Privacy law developments since then. Several accreditation models have been discussed in the IRT including: an Accreditation Agreement applicable to all Privacy Proxy Services Providers, a “Fast-Track Opt-In” model for Registrars interested in providing such services, a “Lightweight Opt-Out” model with requirements including in the Registrar Accreditation Agreement, and a “No Accreditation” Model by which requirements are passed through the Registrars and imposed upon registrants via the Registrar’s Registration Agreement.
- Over the 2026 calendar year, the IRT is expected to sequentially develop the four modules expected to compose the ultimate Accreditation framework: definitions of key terms (by May 2026), Consensus Policy language (by July 2026), data disclosure frameworks (by August 2026) and a human rights impact assessment (by October 2026). All these elements would be subject to a Public Comment proceeding by December 2026.

- **GNSO work on Accuracy of Registration Data**, originally within a Scoping Team formed in October 2021 and subsequently paused for several years, **resumed** in a [GNSO Small Team on Accuracy](#) format (15 May 2025) which made [recommendations to the GNSO Council](#) (31 July 2025). **Recommendation 1 to examine the process for registrars to validate and verify registration data, is identified for possible future work** in the [Final Issue Report on a PDP on DNS Abuse Mitigation](#) (4 December 2025)
 - The GNSO Council adopted substantive and procedural [instructions](#) for the Scoping Team (22 July 2021). In the [ICANN72 GAC Communiqué](#) (1 Nov. 2021) the GAC welcomed “*the effective start of the accuracy scoping exercise launched by the GNSO*” and expressed support for “*all four assignments*” of the team. The GAC nominated representatives from the European Commission and United States to participate in these [weekly deliberations](#) which started on 5 October 2021.
 - The work of the scoping team was informed by an [ICANN org briefing](#) (26 February 2021), an [ICANN org Memo on the WHOIS Accuracy Reporting System](#) (January 2022) and [ICANN org responses](#) to questions by the Scoping Team.
 - In the [ICANN72 GAC Communiqué](#) (1 November 2021) the GAC reiterated “*that maintaining accurate domain name registration data is an important element in the prevention and mitigation of DNS abuse*”. The GAC also noted that it is “*looking forward to exchanging with other constituencies not only on the definition and measurement of accuracy but also on solutions on how to enhance accuracy. The GAC gives particular importance to the verification, validation and correction of all registration data by registrars, and certain registries, in line with their contractual obligations, and supports rigorous monitoring and enforcement of such contractual obligations by ICANN.*”
 - In the [ICANN73 Communiqué](#) (14 March 2022), the GAC highlighted that as part of the work of the scoping team to date, it “*has emphasized the importance of holding contracted parties accountable for their compliance with the existing accuracy requirements, as well as the importance of increasing transparency about compliance, in order to inform an evidence-based analysis of these issues*”
 - In May 2022, the ICANN org shared with the Scoping Team a [set of scenarios](#) for which it **planned to consult the European Data Protection Board** on whether or not ICANN org has a legitimate purpose that is proportionate (i.e. not outweighed by the privacy rights of the individual data subjects) to request that Contracted Parties provide access to registration data records for purposes of accuracy verification.
 - In its [preliminary recommendations](#) for the GNSO Council (2 September 2022) the scoping team recommended:
 - **A registrar Survey** be conducted on the status of accuracy of their domains under management (Recommendation 1). In the [ICANN74 Communiqué](#) (20 June 2022), the GAC noted that “*the voluntary nature of the survey [...] could limit the volume of feedback received*” and therefore encouraged “*the team to explore additional and complementary work items, such as testing accuracy controls in a manner that is not dependent upon access to personally identifiable data*”. However, the preliminary

report notes that “[a]t this stage, the Scoping Team has not identified sufficient benefits of moving forward with any of the other proposals that do not require access to registration data [...]”.

- **A Registrar Audit** be considered regarding Registrars procedures for determining the accuracy of registration data (Recommendation 2)
- **A pause of scoping team work in relation to proposals that require access to registration data** until feasibility is clearer (Recommendation 3) including through: ICANN org’s outreach to the European Data Protection Board (EDPB), a possible Data Protection Impact Assessment to be conducted by ICANN, and the finalization of Data Processing Agreements between ICANN and Contracted Parties.
- **GNSO Council adopted a [motion](#)** (17 Nov. 2022) **pausing the work of the scoping team and deferring consideration of the recommendations to conduct a survey and an audit** *“until such time the DPA negotiations between ICANN org and Contracted Parties have completed and there is feedback from ICANN org on if/how it anticipates the requesting and processing of registration data will be undertaken in the context of measuring accuracy, or for six months, whichever is the shorter”*.
- In a [GNSO Council letter to ICANN org](#) (1 December 2022), **ICANN org was requested to “Proceed with both (i) your outreach to the European Data Protection Board and (ii) your work on a Data Protection Impact Assessment in connection with the scenario(s) in which the request and processing of registration data takes place as a matter of urgency; Finalize negotiations on the Data Processing Agreement (DPA) as soon as practicable, as the absence of a completed DPA may act as a roadblock for the policy work before the GNSO Council.”**
- In a [correspondence to the GNSO Council](#) (14 March 2023) ICANN org reported it has determined that **“a sufficient legal basis exist to proceed” to conduct proactive contractual compliance audit(s) of registrar compliance with registration data validation and verification requirements** (Scenario 2), while further, more targeted outreach with European data protection authorities may be required⁹ regarding analysis by ICANN of a sample of full registration data for validation and verification of contact data (Scenario 3)
- In the [Washington D.C. Communiqué](#) (20 June 2023), the GAC welcomed *“ICANN org’s completion of a Data Protection Impact Assessment (DPIA) on a contractual compliance audit that could shed light on the current state of accuracy”* and sought *“an update on plans to resume the Scoping Team’s work”* given that *“over six months have passed since the GNSO adopted a motion to pause the work of the Scoping Team”*. It further proposed that *“further consideration [be given] to activities that may be resumed by the Accuracy Scoping Team”*.
- In a [GNSO Council letter](#) (3 August 2023) sent to ICANN org and Contracted Parties, the GNSO Council indicated it is *“awaiting on the one hand the outcome of the work by ICANN*

⁹ Consistent with ICANN’s previously stated intention to engage with the European Data Protection Board (see [ICANN letter](#) of 2 June 2022 to the European Commission).

org on the scenario(s) in which the request and processing of registration data takes place and on the other hand the finalization of the Data Processing Agreement (DPA) [...].”

- Regarding the completion of DPAs, in the [Washington D.C. Communiqué](#) (20 June 2023), the GAC flagged “it would be helpful to receive quarterly updates on the status of the DPAs”. The ICANN Board responded in its [Comments on the Issues of Importance in the D.C. Communiqué](#) (18 September): “**ICANN org and the Contracted Parties have just a few issues remaining to negotiate. ICANN org will conduct a public comment period on the DPS once negotiations are completed, so the community can review the terms. Both ICANN org and the Contracted Parties say they remain optimistic the DPS will be in place in time for the implementation of the Registration Data Policy.**”
- Before ICANN78, ICANN org shared with the GNSO Council its [analysis](#) (13 October 2023) of [4 scenarios that were previously identified](#) (9 May 2022) as it relates to ICANN’s possibilities for reviewing the accuracy of registration data¹⁰. In its analysis, **ICANN org concludes that there are several deficiencies and challenges in pursuing the scenarios** and in particular that “*ICANN org does not have a legitimate purpose that is proportionate, i.e., not outweighed by the privacy rights of the individual data subject(s) to request Contracted Parties to provide access to individual records as well as bulk access to registration data in order to review the accuracy of registration data*”. **Alternatively, ICANN org suggests that the ICANN community considers leveraging historical data of ICANN’s compliance audit program** for assessing current validation and verification requirements under the RAA, **and for contracted parties to analyze existing accuracy and verification practices in Europe “as they weigh how to engage in accuracy policy-related discussions at ICANN”**. ICANN further indicates that “*it is compiling these practices and intends to share them with ICANN’s contracted parties to demonstrate the potential for more complex requirements that may come outside ICANN’s multistakeholder model, should the ICANN consensus policy making process be considered ineffective in addressing the issue.*”
- In the meantime, the **GNSO Council resolved** (15 February 2024) to **extend “the deferral of consideration of recommendations #1 and #2 of the Registration Data Accuracy Scoping Team [...] for an additional six months”** while committing to “*considering the Scoping Team recommendations at an earlier date if DPA negotiations have been completed before six months have passed or another significant event, such as the implementation of the NIS2 directive or the publication Inferential Analysis of Maliciously Registered Domains (INFERMAL) Study, occurs before six months have passed*”.
- Following the publication by ICANN of a [draft Data Processing Specifications \(DPS\)](#) applicable to the Registrar Accreditation Agreement and Registry Agreement (29 July 2024), the GNSO Council **resolved** (19 September 2024) to continue “*defer[ing] consideration of the Registration Data Accuracy Scoping Team’s Recommendations #1 and*

¹⁰ The four scenarios are as follows: Scenario 1, Analyze publicly available registration data for syntactical and operational accuracy (as was done previously in the WHOIS ARS program); Scenario 2, Proactive Contractual Compliance audit of registrar compliance with registration data validation and verification requirements; Scenario 3, Analyze a (representative) sample of full registration data provided by registrars to ICANN; and Scenario 4, Registrar registration data accuracy survey (voluntary)

#2 for an additional six months while it determines how to make meaningful progress on the topic” while “recogniz[ing] the importance of Registration Data Accuracy to the ICANN community and commits to continue its discussion of how best to move forward on this topic.”

- In response to the GNSO’s regulatory questions, as part of its [Concept Proposal: Structured SG Assignments for Addressing Accuracy Scoping Team Recommendations and Way Forward](#) (12 September 2024), ICANN org [discussed](#) (10 December 2024) legislative efforts and their impact on registration data accuracy obligations, and stressed the view that *“there is no direct conflict between the [NIS2] implementing laws and ICANN policy and contract requirements”*.
- In response the GNSO’s “threshold” questions several GNSO stakeholder groups and Advisory Committees provided their [input](#), including the [GAC Input on GNSO Council Questions regarding Domain Registration Data Accuracy](#) (14 February 2025)
- A [GNSO Council Small Team](#) was formed (15 May 2025) to review this input and other relevant sources, and to recommend to the Council how best to make progress on this topic.
- In the [ICANN83 GAC Prague Communiqué](#) (16 June 2025), the GAC continued to emphasize the importance of accuracy in domain registration data and expressed continued concerns regarding the pause in the work of the Accuracy Scoping Team since 2022. The GAC welcomed *“the preliminary ideas shared during ICANN83 by the GNSO regarding the work of the new GNSO Small Team”* and noted *“with interest the idea to investigate shortening the timeline for registrars to perform registration data validation and verification.”*
- On 14 August 2025, the GNSO Council unanimously approved the [recommendation of GNSO Small Team on Registration Data Accuracy](#) (31 July 2025) to:
 - **Examine the existing process for validating and verifying registration data** under the 2024 Registrar Accreditation agreement and the potential impact on registrants if this process is modified (Recommendation 1)
 - **Create clear and user-friendly educational materials** that could be provided before, during, and after domain name registration to educate registrant on the importance of providing and maintaining accurate registration data (Recommendation 2)
 - **Further consideration of the Registration Directory Service (RDS) Whois 2 Review Team’s outstanding board-approved recommendation CC.1 regarding the suspension of domain whose contact data is accurate** (Recommendation 3)
 - **Discontinuing further work of the Accuracy Scoping Team** (Recommendation 4)
- Recommendation 1 of the Small Team on Registration Data Accuracy was reflected in the [Final Issue Report on a Policy Development Process on DNS Abuse Mitigation](#) (4 December 2025) which discusses the *“Lack of Proactive/Timely Contact Verification”* as a potential policy gap to mitigate DNS Abuse and for which a potential solution identified is to *“examining the existing process for validating and verifying registration data under 2024 Registrar Accreditation Agreement”* (See p.14).

- In the [GAC Dublin Communiqué](#) (3 November 2025), the GAC:
 - Recommended that registrars be required validation and verification of registration data before a newly registered domain name can become accessible through the DNS,
 - Encouraged ICANN org undertake a holistic assessments of the evolution of technologies and registration practices that may affect the accuracy and reliability of domain registration data,
 - Called for the ICANN community to maintain an active forum in which to continue discussing possible next steps related to accuracy.
- In the [GAC Mumbai Communiqué](#) (16 March 2026), the GAC The GAC expresses “*strong interest in engaging further with the Board and the Contracted Parties on how to address – in a swift and effective manner – the current 15-day timeline for registrars to validate and verify registrants contact information*” noting that as stated in the [INFERMAL study](#) (8 Nov. 2024) “*when the validation of registrant information takes place during the account creation or before the domain purchase, it is associated with a 70% decrease in malicious registrations*”. The GAC thus proposed that “*to mitigate DNS Abuse, verification of registrant contact information should take place before a newly registered domain name can become accessible through the DNS. A possible path to be further explored in this regard is contract amendments, and the GAC will continue to consider the best path for efficient implementation.*”
- For reference, status of the **Review Team recommendations regarding Registration Data Accuracy**, as reported in the ICANN Specific Reviews Q2 2023 Quarterly Report (31 March 2024) and per ICANN Board resolutions on [10 September 2023](#) and [21 December 2023](#) on certain RDS-WHOIS2 Review and SSR2 Review Recommendations, was as follows:
 - **Recommendations 4.1, 4.2 and 5.1 of the RDS-WHOIS2 Review Team [Final Report](#)** (3 September 2019) **relating to data accuracy monitoring and enforcement** (all identified as “High” priority) **were rejected** in light of: ICANN Compliance already enforcing existing requirements within the Registry Agreement and RAA provisions; Further community discussions are required to define accuracy and what constitutes a “systemic issue” in registration data accuracy; and ICANN’s assessment of legalities of the associated data processing in its [Assessment of Registration Data Accuracy Scenarios](#) (13 October 2023)
 - **Recommendation 9.2 of the SSR2 Review Team [Final Report](#)** (25 January 2021), for ICANN org to **proactively monitor and enforce contractual obligation to improve accuracy of registration data was rejected** (10 September 2023) in light of: ICANN org’s ability to pursue “*accuracy of registration data according to the provisions included in the RA and RAA, and that at present extensive checks are conducted to verify the accuracy of registration data.*”; The Recommendation seeking “*the enforcement of specific compliance requirements (i.e., address fields) regarding data accuracy that are not part of the current registry and registrar contractual framework;*

The Recommendation calling for *“work or outcomes that would require the Board to unilaterally modify ICANN's agreements with registries and registrars, or that would be contingent on community work. Changes to contracted party agreements would be a matter of policy or a result of voluntary negotiations between ICANN org and contracted parties; “ongoing community discussions on registration accuracy”.*

Reminder on the status of other policy issues, policy development and policy implementation processes pending further consideration

- **Policy Development in Phase 2 of the EPDP on Registration Data concluded** with the publication of a [Final Report](#) (31 July 2020), which recommended a System for Standardized Access/Disclosure (SSAD) to gTLD Registration Data with a significant level of divergence among stakeholders as documented in the Consensus Designations (Annex D) and Minority Statements (Annex E), including the [GAC Minority Statement](#) (24 August 2020).
 - **Consensus was achieved on** aspects of the SSAD relating to **accreditation of requestors and centralization of requests** (recommendations 1-4, 11, 13 and 15-17). Once implemented these recommendations should improve the current fragmented systems by providing a central entry point to request access to registration data, according to clearly defined standards, and providing guarantees of appropriate processing.
 - **Stakeholders could not agree on** the policy recommendations necessary to provide for a **System for Standardized disclosure** that meets the needs of all stakeholders involved, including public authorities (recommendations 5-10 and 12). Neither could stakeholders agree on the possibility to evolve the SSAD towards more centralization and more automation of disclosure decisions in the future. (recommendation 18)
 - In the [ICANN70 GAC Communiqué](#) (25 March 2021), the GAC advised the ICANN Board *“to consider the [GAC Minority Statement](#) and available options to address the public policy concerns expressed therein, and take necessary action, as appropriate.”* The Board [accepted](#) the advice (12 May 2021) noting that *“standing on its own, the GAC’s Minority Statement does not constitute consensus advice”*, and included a detailed discussion of issues raised in the GAC Minority Statement on EPDP Phase 2.
 - The GAC issued a [response](#) (6 October 2021) to the Board’s [clarifying questions](#) on the ICANN70 advice that were reiterated before and discussed during the [GAC/Board ICANN71 Communiqué clarification call](#) (29 July 2021)
 - In the context of the then expected roll out of a pilot Registration Data Request Service (RDRS), the **ICANN Board** [confirmed](#) (9 June 2022) its agreement with the GNSO and **decision to pause the consideration of the EPDP Phase 2 policy recommendations.**
 - Since ICANN85 (March 2025), **the ICANN Board and GNSO Council took the necessary steps to launch the process** described in the [ICANN Bylaws, Annex A](#), Sec. 9 **which provides for modification of GNSO Policy Recommendations** (Supplemental Recommendations). This [process](#) was discussed in the GNSO Council in January 2026 and an initial dialogue with members of the ICANN Board took place in the GNSO Council meeting on Thursday 12 February (see [Agenda](#) Item 5)
 - The ICANN Board [resolved](#) to not adopt the original SSAD Recommendations (12 March 2026)
 - The GNSO Council convened the [SSAD Supplemental Recommendations Team \(SRT\)](#) to propose modifications to the original 18 SSAD recommendations by February 2027.

- **Policy Development in Phase 2A of the EPDP** to address the issues of **legal vs. natural persons** and the **feasibility of unique contacts** to have a uniform anonymized email address, **concluded** with the publication of a [Final Report](#) (3 September 2021), a subsequent ICANN [Board resolution](#) (10 March 2023) directing their implementation and recent clarification by ICANN org that *“it will ultimately be up to the technical community to determine [whether] a field will be created to distinguish between legal and natural persons.”*
 - The EPDP Team Chair presented the report as *“a **compromise that is the maximum that could be achieved** by the group at this time under our currently allocated time and scope, and it **should not be read as delivering results that were fully satisfactory to everyone**”* underscoring *“the importance of the minority statements in understanding the full context of the Final Report recommendations”*
 - In its [Minority Statement](#) (10 September 2021), the GAC acknowledged *“the usefulness of many components of the Final Recommendations”* including:
 - *the creation of data fields to flag/identify legal registrants and personal data;*
 - *specific guidance on what safeguards should be applied to protect personal information when differentiating between the domain name registrations of legal and natural persons;*
 - *encouragement for the creation of a Code of Conduct that would include the treatment of domain name registration data from legal entities;*
 - *encouragement for the GNSO to follow legislative developments that may require revisions to the current policy recommendations, and*
 - *useful context and guidance for those who wish to publish pseudonymized emails.*
 - **The GAC** noted however that it *“remains concerned that almost none of the Final Recommendations create enforceable obligations”* which *“fall short of the GAC’s expectations for policies that would require the publication of domain name registration data that is not protected [...] and create an appropriate framework to encourage the publication of pseudonymized email contacts with appropriate safeguards.”*
 - After adoption of these policy recommendations by the GNSO Council, the ICANN Board provided the [bylaw-mandated notification to the GAC](#) (9 Dec. 2021), in [response](#) to which **the GAC requested that the ICANN Board** *“considers [...] the GAC Minority Statement in its entirety, as well as available options to address the outstanding public policy concerns expressed therein.”* (9 Feb. 2022).
 - On 10 March 2022, the ICANN Board [adopted](#) the Phase 2A policy recommendations and directed ICANN org to develop and execute an implementation plan for these resolutions.
 - In the [GAC Comments](#) on the proposed Draft Registration Data Consensus Policy for gTLD (21 November 2022), **the GAC expressed public policy concerns in connection with the implementation of EPDP Phase 1 recommendations without those of Phase 2A**, resulting in a partial system and a policy gap. In response, ICANN org reached out to the GAC Small Group on WHOIS/EPDP with a [memo](#) (5 May 2023) which clarified, inter alia, that *“it will ultimately be up to the technical community to determine [whether] a field will be created to distinguish between legal and natural persons”*

- In the [ICANN82 GAC Seattle Communiqué](#) (17 March 2025), the GAC stated on this matter: *When reviewing the progress of implementation of its strategic plan, the GAC noted concerns related to one of its expected outcomes for 2024- 2025, “to track developments related to the collection and publication of registration information related to legal entities.” In particular, the GAC is concerned by the lack of any progress regarding the implementation of EPDP Phase 2A recommendations, which the Board adopted in 2022. The GAC reiterates its position expressed in the ICANN77 Communiqué that “contracted parties should collect and make data of legal persons publicly available.”*
- The ICANN Board subsequently commented on the GAC Seattle Communiqué (4 April 2025) that: *“EPDP Phase 2A recommendations are in the queue for implementation, which is subject to the completion of EPDP Phase 1 implementation work now underway.”*
- Following the conclusion of the work of the EPDP Phase IRT¹¹, and In its context of its review of progress on the Expected Outcomes of the [GAC Annual Plan 2025/2026](#), the GAC leadership determined that work to enable the collection and publication of legal entities’ registration data¹² had not progressed since the related EPDP Phase 2A Policy Recommendations were [adopted by the ICANN Board](#) in March 2022. The GAC Chair thus sought advancement of the related policy implementation in a [correspondence to the ICANN Board](#) (11 May 2026).

● Publication of Reseller information in domain registration data

- The CCT Review [Final Report](#) (8 September 2018) recommended per **Recommendation 17** that ***“ICANN should collect data about and publicize the chain of parties responsible for gTLD domain name registrations”*** which the ICANN Board [accepted](#) (1 March 2019) since *“reseller information is already displayed within the publicly available WHOIS, reliant upon all contracted parties complying with ICANN Consensus Policies and contractual obligations to provide such data”*
- In [GAC Comments on the Final Report and Recommendations of the CCT Review Team](#) (11 December 2018) the GAC endorsed this recommendation, as part of a set of recommendations encouraging the collection of data to ***“allow for more informed decision and policy making, particularly with regard to future standard registry and registrar contract provisions and any subsequent rounds of gTLDs.”***
- In [GAC Comments](#) (21 October 2019) on the [CCT Review Team Accepted Recommendations - Plan for Implementation and Next Steps](#) (11 Sep. 2019), the GAC noted that *“[a]lthough the ICANN Board accepted this recommendation, the proposed implementation plan is not robust. [...] ICANN should take a more active role in educating the community about why this information is necessary in order to track and publish*

¹¹ See *infra*, discussion of Urgent Requests for disclosure of Registration Data.

¹² See Expected Outcome 5.1.3 on p.10: *“The GAC will continue to track developments related to the collection and publication of registration information related to legal entities including expected work by ICANN and the technical community to develop any necessary standards needed to facilitate differentiation between legal and natural person registration data within EPDP and RDAP”*

information about DNS Abuse, and spearhead community discussions directed to requiring contracted parties to collect and publish this information in order to promote increased transparency and accountability.”

- In its [Final Implementation Report](#) (14 September 2022), ICANN org noted that CTT Review Recommendation 17 ***“has been implemented to the extent possible consistent with current policy requirements”*** and that ***“no further action is required”***. In particular, it referred to the [Advisory: Clarifications to the Registry Agreement, and the 2013 Registrar Accreditation Agreement \(RAA\) regarding applicable Registration Data Directory Service \(Whois\) Specifications](#), published on 12 September 2014 and noted that the Reseller field is *“optional and should be treated as described in the Advisory”*. It in fact a subsequent Advisory, which superseded the previous version, the [Advisory: Clarifications to the Registry and Registrar Requirements for WHOIS \(port 43\) and Web-Based Directory Services](#) published on 27 April 2015 and last updated on 25 May 2018, which states:

50. The value section of the "Reseller" field SHOULD be shown, but MAY be left blank or the whole field MAY not be shown at all. If shown, the value of the field MUST be the name of the organization, in case the Reseller for the name is a legal entity, or a natural person name otherwise.
- In the context of the phasing out of the WHOIS protocol and its replacement by the Registration Data Access Protocol, in [GAC Comments on the proposed Registration Data Access Protocol \(RDAP\) and Bulk Registration Data Access \(BRDA\) Contractual Amendments](#) (16 November 2022), the GAC noted that the [RDAP Response Profile](#) provides that *“the returned domain object in the RDAP response MAY contain an entity with the reseller role, if the domain name was registered through a reseller.”* It further stressed that ***“In recognition of the purposes of the RDDS system and the evolving domain name industry, the GAC supports the inclusion of all entities inherent to the registrar’s domain name registration data distribution channel. Such entities should be included in an RDAP query response, when they exist.”***
- In response, in its [Public Comment Summary Report](#) (16 December 2022), ICANN org acknowledged the GAC’s comment and noted ***“that ICANN org will continue to work with the ICANN community to identify how roles and entities are represented in RDDS as part of the policy development process and will work with the contracted parties to update the respective agreements as policies require.”***
- As part of a [Public Comment proceeding on the proposed draft Registration Data Consensus Policy](#), in a [GAC Comment on the Draft Registration Data Consensus Policy for gTLDs](#) (21 November 2022), the GAC suggested that instead of *“6.4 Registrar MAY generate the Reseller data element value.”* the policy should read *“6.4 Registrar SHOULD generate the Reseller data element value, for the Reseller with a direct relationship with the Registrant.”* The GAC observed that *“the domain name industry has evolved considerably since ICANN’s inception, and today includes roles and entities which may not have existed in previous RDDS systems; similarly, new entities may be created tomorrow which have yet to be conceived of today. In recognition of this, the GAC supports the*

inclusion of corporate entities inherent to the registrar's distribution channel (such as the RDAP Response Profile entity 2.5 enumerating the "reseller" role) as it is the purpose of the RDDS system to enumerate roles and responsibilities relevant to domain name registrations; such entities should be included in an RDAP response, when they exist. This would also prove as a benefit in highlighting the best point of contact to deal with notifications of abuse or compromise to the party with the ability to act the quickest or most appropriately".

- In its Review of Public Comments (28 April 2023) as appended to the original [Public Comment Summary Report](#) (20 January 2023) [see after p.39], ICANN org stated:

"After careful consideration of the public comments received, the IPT determined that additional changes should not be made to the policy language pertaining to the requirements related to the reseller field. There is no indication that the draft policy was drafted incorrectly, and the EPDP Phase 1 team determined that the collection, transfer, and publication of the reseller field remain optional. The draft policy language maintains the status quo as org recognizes that current business practices allow for the optional collection, transfer, and publication of the reseller field. Thus, the IPT believes that making any recommended changes is beyond the scope of the policy as it would create additional changes that are not required by the EPDP Phase 1 recommendations.

Key Reference Documents

- SSAD Supplemental Recommendations
 - [GNSO Assignment](#) and [workspace](#) of SSAD Supplemental Recommendations Team (May 2026)
 - [ICANN Board resolution](#) (12 March 2026) to not adopt the original SSAD Recommendations
- Registration Data Request Service (RDRS)
 - [GAC Comments](#) (15 December 2025) on the ICANN org [RDRS Policy Alignment Analysis](#) (30 October 2026)
 - [Final RDRS Standing Committee Report](#) (10 November 2025)
 - [ICANN Board resolutions](#) (30 October 2025) regarding the continuation of the Registration Data Request Service (RDRS)
 - [GAC Comments](#) (29 Sept. 2025) on the [RDRS Standing Committee Report](#) (19 August 2025)
 - [RDRS Usage Metrics Reports](#) (since December 2023)
 - [Addendum](#) (7 Nov. 2022) to the SSAD ODA Small Team [Preliminary Report](#) (4 April 2022) regarding requirements for an SSAD proof of concept.
 - [WHOIS Disclosure System ICANN Design Paper](#) (13 Sep. 2022)
- Urgent Requests for disclosure of registration data
 - Updated [Registration Data Policy](#) (12 May 2026)
 - [GAC Comments](#) (15 December 2025) on the [Timeline for Urgent Request Public Comment Proceeding](#) (22 October 2025)
 - Latest [ICANN org proposed Consensus Policy language](#) (3 October 2025)
 - [GNSO Council Follow-up - Clarifying Question and Additional Considerations, to GAC Chair](#) (15 January 2024)
 - [GAC Chair to ICANN Board](#) (15 October 2024)
 - [GNSO Council response to the ICANN Board](#) (29 August 2024)
 - [ICANN Board letter to the GNSO Council](#) (3 June 2024)
 - [GAC Chair letter to the ICANN Board Chair](#) (23 August 2023) on the timeline for response to Urgent Request in the proposed Final Registration Data Consensus Policy, and [ICANN Board response](#) to the GAC Chair (11 February 2024).
- Policy development on gTLD Registration Data (EPDP Phase 1, 2, 2A)
 - [GAC Chair correspondence to the ICANN Board](#) (11 May 2026) regarding the advancement of policy implementation on the collection and publication of legal entities domain name registration data.

- [ICANN org Review of Public Comment](#) (28 April 2023) - starting p.40 - on the [Draft Registration Data Consensus Policy for gTLDs](#) (24 August 2022)
- [GAC Comments](#) (21 November 2022) on the [Draft Registration Data Consensus Policy for gTLDs](#) (24 August 2022)
- [Draft Registration Data Consensus Policy for gTLDs](#) (24 August 2022)
- ICANN org [Operational Design Assessment of the SSAD](#) (25 January 2022)
- [GAC Minority Statement](#) (10 Sep. 2021) on EPDP Phase 2A [Final Report](#) (3 Sep. 2021)
- [GAC Minority Statement](#) (24 August 2020) on EPDP Phase 2 [Final Report](#) (31 July 2020)
- Accuracy of Registration Data
 - [GAC Chair correspondence to the ICANN Board and GNSO Council](#) (11 May 2026) seeking the convening of a trilateral dialogue to address domain registration data accuracy during ICANN86.
 - [Final Issue Report on a Policy Development Process on DNS Abuse Mitigation](#) (4 December 2025) which discusses the “*Lack of Proactive/Timely Contact Verification*” as a potential policy gap to mitigate DNS Abuse and for which a potential solution identified is the GNSO Council Accuracy Small Team recommendation to “*examining the existing process for validating and verifying registration data under 2024 Registrar Accreditation Agreement*” (See p.14)
 - Panel discussion on Accuracy during the [ICANN84 GAC Plenary Session on Registration Data](#) (28 October 2025) as reflected in the [Minutes of the GAC ICANN84 Dublin Meeting](#) (p. 7)
 - [ICANN Compliance Presentation on the Enforcement of accuracy-related requirements](#) (15 October 2025) during a GAC Pre-ICANN84 Webinar
 - [Recommendations](#) (31 July 2025) of the [GNSO Small Team on Registration Data Accuracy](#), adopted by the GNSO Council (14 August 2025)
 - [Assignment](#) and [deliberations](#) of the GNSO Small Team [on Accuracy](#) (15 May 2025)
 - [GAC Input on GNSO Council Questions regarding Domain Registration Data Accuracy](#) (14 February 2025) and [input from other Advisory Committees and Stakeholder Groups](#).
 - [ICANN org response to GNSO Council regulatory questions](#) (10 December 2024)
 - ICANN org [Assessment of Registration Data Accuracy Scenarios](#) (13 October 2023)
 - [ICANN Org Correspondence to the GNSO Council](#) regarding the Registration Data Accuracy Scoping Team (14 March 2023)
 - Accuracy Scoping Team [preliminary recommendations](#) to the GNSO Council (2 Sep. 2022)
 - [ICANN org Update to the Accuracy Scoping Team](#) on scenarios for EDPB engagement (9 May 2022)
- GAC Communiqué and Board response

- [ICANN85 Mumbai Communiqué](#) (16 March 2026) Issues of Importance related to Urgent Requests, RDRS/SSAD, Privacy and Proxy Services, and Accuracy of Registration Data (under the heading of DNS Abuse); as well as:
 - [ICANN Board Comments](#) on the Issues of Importance (20 April 2026)
- [ICANN84 Dublin Communiqué](#) (3 November 2025) Issues of Importance related to the Urgent Requests, RDRS, Accuracy of Registration Data; as well as:
 - [ICANN Board Comments](#) on the Issues of Importance (6 January 2026)
- [ICANN83 Prague Communiqué](#) (16 June 2025) Issues of Importance related to the Urgent Requests, RDRS, Accuracy of Registration Data; as well as:
 - [ICANN Board Comments](#) on the Issues of Importance (1 October 2025)
- [ICANN82 Seattle Communiqué](#) (17 March 2025) Issues of Importance related to the Urgent Requests, RDRS, Accuracy of Registration Data, and Other Public Policy Concerns Regarding Registration Data; as well as:
 - [ICANN Board Comments](#) on the Issues of Importance (4 April 2025)
- [ICANN81 Istanbul Communiqué](#) (18 November 2024) Issues of Importance related to the RDRS, Privacy/Proxy Accreditation Policy Implementation, Registration Data Accuracy, and Urgent Requests; as well as:
 - [ICANN Board Comments on the Issues of Importance](#) (29 January 2025)
- [ICANN80 Kigali Communiqué](#) (11 June 2024) Follow-up on Previous Advice regarding Urgent Requests, and Issues of Importance related to the RDRS, Registration Data Accuracy, and Privacy/Proxy Accreditation Policy Implementation; as well as:
 - [Scorecard of Board Action](#) regarding the Follow-up on Previous Advice regarding Urgent Requests (7 September 2024)
 - [ICANN Board Comments on the Issues of Importance](#) (15 October 2024)
- [ICANN79 San Juan Communiqué](#) (11 March 2024) GAC Advice on Urgent Requests, and Issues of Importance related to the RDRS, Privacy/Proxy Accreditation Policy Implementation, and Registration Data Accuracy; as well as:
 - [Scorecard of Board Action](#) regarding Advice in the San Juan Communiqué (5 May 2024)
 - [ICANN Board Comments on the Issues of Importance](#) (9 May 2024)
- [GAC Washington D.C. Communiqué](#) (20 June 2023) Follow up on Previous GAC Advice on Privacy Proxy Services; and Issues of Importance in the on the Registration Data Consensus Accuracy, the RDDS and the Registration Data Consensus Policy, as well as:
 - [Scorecard of Board Action](#) regarding Advice in the D.C. Communiqué (10 Sep. 2023)
 - [ICANN Board Comments on the Issues of Importance](#) (18 September 2023)

- GAC Advice in the ICANN76 [Cancún Communiqué](#) (20 March 2023) on Privacy/Proxy Services, and the related
 - [Summary Notes](#) of the Board/GAC Clarification Call (11 April 2023)
 - [Scorecard of Board Action](#) regarding Advice in the GAC Cancún Communiqué
- GAC Advice in the [GAC ICANN72 Communiqué](#) (1 Nov. 2021) and related ICANN Board [Scorecard](#) (16 January 2022)
- GAC Advice in the [GAC ICANN71 Communiqué](#) (21 June 2021) and related ICANN Board [Scorecard](#) (12 September 2021)
- GAC Advice in the [GAC ICANN70 Communiqué](#) (25 March 2021), related ICANN Board [Scorecard](#) (12 May 2021) and [GAC Response to ICANN Board Clarifying Questions](#) (16 Nov. 2021)
- [GAC Response](#) (6 October 2021) to [ICANN Board Clarifying Questions](#) (21 April 2021) on the ICANN70 GAC Advice regarding the GAC Minority Statement on EPDP Phase 2, as reiterated during the ICANN71 Communiqué clarification discussions.

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GAC Discussion on New gTLD Program Next Round

Session 7

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Session Objective

GAC Members continue preparing for the 2026 Round of New gTLDs, building on the Capacity Development Sessions preceding this session and recent discussions regarding GAC preparedness for the Next Round.

The session will focus on recent developments and upcoming milestones in the New gTLD Program: Next Round, including updates on implementation progress and the Applicant Support Program (ASP), followed by a discussion on practical considerations for GAC engagement as the application process advances.

The discussion will provide an opportunity for GAC members to exchange views on anticipated challenges, preparedness needs, and possible approaches to support effective GAC engagement ahead of future milestones in the Next Round.

Leadership Proposal for GAC Action

1. GAC Members to receive updates from ICANN org regarding recent developments in the New gTLD Program: Next Round, including implementation progress, projected milestones, and developments related to the Applicant Support Program (ASP).
2. GAC Members to discuss practical considerations for engagement in the Next Round, including anticipated challenges, support needs, and areas where further capacity development may be useful.

3. GAC Members to exchange views on approaches which could support effective and timely GAC engagement as the application process progresses, and identify whether additional discussions or guidance may be beneficial ahead of future stages of the Next Round.

Current Status and Recent Developments

New gTLD Program: 2026 Round – Status Update

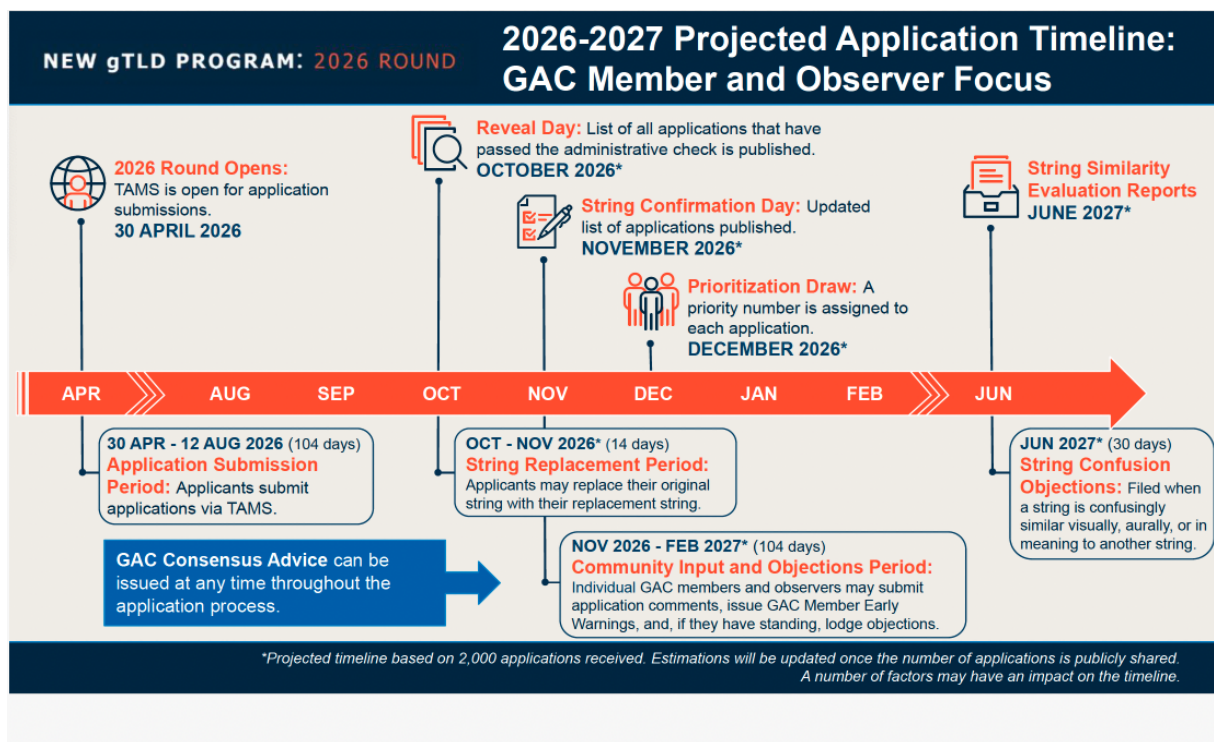
The application submission period for the New gTLD Program: 2026 Round opened on 24 April 2026 and is expected to remain open for approximately 15 weeks, until 22 August 2026, subject to confirmation by ICANN org. Following closure of the application window, ICANN org will confirm projected dates for String Confirmation Day, Reveal Day, and subsequent stages of the evaluation process.

Following the opening of the application period, ICANN org continues to publish materials and guidance intended to support applicants and the wider community in understanding the Applicant Guidebook (AGB), evaluation processes, and opportunities for community input.

The Next Round timeline foresees several milestones of relevance to governments and GAC members, including:

- Application Submission Period (15 weeks);
- String Confirmation Day;
- GAC Early Warning period (104 days);
- Opportunities for Public Comments and Objections;
- Potential GAC Consensus Advice following publication of applications and progression through evaluation stages.

Projected timelines remain dependent on the number of applications received and may be updated by ICANN org.



Applicant Support Program

The Applicant Support Program (ASP) continues to advance following completion of the application period for support requests and associated evaluation processes.

The ASP was designed to support applicants from underserved regions and communities by reducing financial and non-financial barriers to participation in the Next Round. The program includes financial assistance, as well as access to guidance and support resources intended to facilitate participation.

ICANN org has continued developing supplementary materials to support applicants, including:

- [Applicant readiness materials](#), which were translated in the six ICANN languages, and published on the Next Round website
- the [ASP Application System User Guide](#),
- [ASP Applicant Checklist](#), and the
- [ASP Applicant Quick Start Guide](#).

The GAC has previously expressed interest regarding the effectiveness and accessibility of the ASP, including through exchanges with the Board and collaboration with ALAC. The session provides an opportunity for GAC members to receive updates regarding implementation and uptake of the program.

Applicant Guidebook (AGB) and Supporting Materials

Following the ICANN Board's adoption of the final Applicant Guidebook at ICANN84, ICANN published the final version on 16 December 2025. The authoritative version of the New gTLD Program: 2026 Round Applicant Guidebook, is available [here](#). To view the web version in html, [click here](#). The Guidebook is the essential roadmap to the program, providing interested parties with the application questions and all the information they need to apply for new gTLDs. It lays out the requirements to lead readers through application submission and evaluation processes.

Recognizing the complexity of the AGB and associated processes, ICANN org has continued developing complementary resources including:

- [Key Topic Overviews](#)
- [Frequently Asked Questions \(FAQs\)](#)
- [Webinars and ICANN Meeting Sessions](#)

Relevant Key Topic Overviews include topics such as geographic names, objections and appeals, Governmental Advisory Committee (GAC) Early Warnings and Advice, and other mechanisms for community input.

Emerging Considerations for GAC Preparedness

Building on discussions held during Capacity Development Sessions and exchanges among GAC Leadership and Topic Leads, members may wish to consider practical aspects of GAC preparedness as the Next Round progresses.

Potential discussion areas include:

- anticipated challenges arising from the volume and complexity of applications;
- lessons learned from previous rounds and related GAC processes;
- support or capacity development needs identified by GAC members;
- practical approaches to facilitate timely and effective GAC engagement during future stages of the process;
- considerations regarding coordination and preparation ahead of periods of increased activity, including opportunities for community input and GAC deliberation.

The intention of these discussions is to support preparedness and identify potential areas where further capacity development or dialogue may be beneficial, while preserving the flexibility and member-driven nature of existing GAC processes.

Key Reference Documents

- [New gTLD Program: 2026 Round Applicant Guidebook](#) (16 December 2025)
- Applicant Guidebook Resources - [Key Topic Overviews](#)
- [New gTLD Program: 2026 Round Resources Page](#)

- [GAC Workbook: 2026 Round Community Input Actions \(March 2026\)](#)
- [Projected Timeline for GAC Community Input Actions \(2026 Round\)](#)

Further Information

- GAC Policy Background Document on Subsequent Rounds of New gTLDs:
<https://gac.icann.org/briefing-materials/public/gac-policy-background-new-gtlds-subsequent-rounds.pdf>

Document Administration

Title	ICANN86 GAC Session Briefing - GAC Discussion on New gTLDs
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GAC Meeting with ICANN Board

Session 8

Session Objectives

An ICANN Public Meeting is an opportunity for the GAC to meet and interact with ICANN groups and other organizations, enabling the committee to strengthen its channels of communication with these groups to address current issues of government interest and facilitate future informational exchanges, and facilitating the discussion and resolution of specific policy concerns .

The GAC Meeting with the ICANN Board of Directors is one of these opportunities that takes place at every ICANN Public Meeting. The Tuesday 9 June meeting at ICANN85 will enable the GAC to share its views with the Board and ask timely questions on topics of importance to governments that are within ICANN's remit.

Recent Developments

Recent GAC-Board joint meetings have covered a range of subjects and topics that were centered on formal questions the GAC submits to the Board before the start of the ICANN Public Meeting. At the Community Forum and the Annual General Meeting, the Board typically also requests feedback on topics on which it wishes to engage with each community structure. At this Policy Forum, the meeting will focus on the topics and questions submitted by the GAC.

GAC members were asked to share potential topics and questions via email, to be compiled by GAC staff support for curation by the GAC leadership team and discussion during the GAC's final Agenda Setting Call on 1 June 2026. On this call, GAC Members reviewed the list of questions submitted. Several questions were confirmed while those relating to various aspects of access to gTLD registration data were referred to the GAC's topic leads for further refinement. GAC staff support will submit the final set of questions to the Board ahead of the meeting on Tuesday 9 June.

Session Agenda

Session #8 - Tuesday, 9 June - GAC Meeting with ICANN Board

A preliminary meeting agenda for the joint meeting is:

1. Introductions
2. Review of GAC Topics/Questions to the Board (shared in advance of meeting)
3. AOB
4. Closing

As of 1 June, the questions that were submitted by GAC delegates covered the following topics:

1. The Applicant Support Program
2. gTLD Registration Data
3. Regional Internet Registry Governance
4. Large Scale, Non-Standardized DNS/IP Blocking

Further Information

Other Board-GAC Interactions -

- Within the ICANN multistakeholder community, the GAC has a fundamental relationship with the ICANN Board of Directors that is detailed in the ICANN Bylaws (see ICANN Bylaws Section 12.2(a)) and the Board-GAC meeting is a regular feature of every ICANN Public Meeting - <https://www.icann.org/resources/pages/governance/bylaws-en/#article12>
- From time-to-time, the GAC also hosts a meeting of the Board-GAC Interaction Group (BGIG). For this meeting cycle, that meeting took place on 23 April 2026, during which Board members shared their reactions to the GAC Issues of Importance identified in the ICANN85 Mumbai Communiqué. Information materials about that interaction can be found here - <https://gac.icann.org/sessions/boardgac-interaction-group-bgig-call-23-april-2026>.

Topical Reference Documents -

- [ICANN Action Request Registry of GAC Advice](#)

Document Administration

Title	Session 8 - ICANN86 GAC Meeting with ICANN Board
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GAC Leadership and Operations Update

Session 10

Session Objective

From time to time, the GAC holds sessions during ICANN Public Meetings to review, discuss, and make decisions on GAC operational matters, including committee processes, work planning, or to improvements to how the committee conducts its work.

For ICANN86, this “operating matters” session will focus on an update on the progress of the GAC Annual Plan, a discussion about the GAC’s participation in the Nominating Committee, a discussion on the proposed approach for the Continuous Improvement Program (CIP) and a proposal for a GAC Capacity Development Working Group.

Leadership Proposal for GAC Action

1. Review progress on the GAC Annual Plan (including an update on the 2026 GAC Leadership Retreat in Brussels)
2. Discuss the GAC’s participation in the Nominating Committee (NomCom)
3. Discuss a proposed approach to the Continuous Improvement Framework (CIP)
4. Review of a proposal for a GAC Capacity Development Working Group

Current Status and Recent Developments

- **Review progress on the GAC Annual Plan**

As input for the GAC Leadership Retreat that took place in April 2026, the GAC Topic Leads provided an update on progress of each of the Expected Outcomes in the [GAC Annual Plan 2025/2026](#). This enabled the identification of specific pain points which were discussed by the GAC Leadership towards identifying action which could be take to unlock progress of relevant work.

The Annual Plan 2025/2026 Progress Tracker is reproduced in Annex to this briefing and provides detailed status information for all the Expected Outcomes for 2025/2026 for each of the 9 GAC Strategic Objectives.

- **2026 GAC Leadership Retreat**

The GAC Leadership held a retreat in Brussels on 14-16 April 2026 which focused on reviewing progress on the activities noted in the GAC Annual Plan, including discussions about how to increase the GAC's effectiveness in ICANN and Internet Governance, as well as moving the needle on specific expected outcomes detailed in the Plan. During ICANN86, the GAC Leadership will share highlights from these discussions and decisions.

- **GAC Participation in the Nominating Committee**

ICANN's Nominating Committee (NomCom) selects individuals for key ICANN leadership positions, including ICANN Board members. Under the ICANN Bylaws, the GAC may appoint a voting delegate to participate in NomCom deliberations, although this role has not been actively filled in recent years.

The delegate role operates within NomCom's independent and confidential processes. Consistent with NomCom operating principles, delegates act in the interests of the global Internet community and do not serve in a representational capacity on behalf of their appointing organizations. In practice, the GAC has more recently engaged through submissions outlining candidate criteria, emphasizing public policy expertise, government experience, public interest considerations, and geographic diversity.

The ICANN86 discussion provides an opportunity to consider whether the GAC should appoint a delegate to the NomCom and, if so, what expectations and qualifications should apply to the role.

- **Continuous Improvement Framework (CIP): Discussion of Proposed Approach for the GAC**

The Continuous Improvement Program (CIP) was developed based on recommendations from the Third Accountability and Transparency Review (ATRT3) that the ICANN Board approved. Designed as a replacement for the periodic Bylaws-mandated Organizational Reviews, the aim of the CIP is to establish a continuous and tailored approach to assessing and improving the effectiveness of ICANN's Supporting Organizations (SOs), Advisory Committees (ACs), and the Nominating Committee. The framework follows a three-year cycle of assessment, implementation, and reporting against five common principles related to purpose, effectiveness, efficiency, accountability, and collaboration.

At the request of GAC leadership, staff has prepared a proposed approach for the GAC's first CIP cycle. The staff proposal is intended as a lightweight approach that leverages existing work under the GAC Strategic and Annual Plans while minimizing additional workload. The ICANN86 discussion will provide an opportunity for the GAC to consider the proposed approach and next steps for implementation.

- **GAC Capacity Development Working Group Proposal**

The GAC Capacity Development Working Group proposal emerged from recent GAC Leadership discussions and builds on previous approaches to capacity development planning. The draft proposal has been circulated to the GAC mailing list for review and feedback ahead of the ICANN86 Meeting, where the topic is expected to be discussed further under Session 10: GAC Leadership and Operations Updates, with a view to gathering community input and exploring possible convergence on next steps.

The document notes that the GAC is facing increasing capacity development needs, driven by evolving ICANN policy work, developments in the digital ecosystem, and the continuous rotation of GAC representatives. At the same time, it observes that current efforts remain somewhat fragmented, with responsibilities spread across different groups and activities not always strategically coordinated.

To address these challenges, the draft proposal explores the possible establishment of a dedicated Capacity Development Working Group (CDWG), which could serve as a coordinating mechanism for GAC capacity development activities. The intention would not be to replace the work of existing Working Groups or Topic Leads, but rather to help coordinate efforts across the committee. Other groups, including the USRWG, would continue identifying needs and priorities in their respective areas, while the CDWG could help translate those needs into more structured, timely, and sustainable capacity development activities.

The proposal also outlines a number of possible guiding principles for future capacity development efforts, including the importance of clearly defined learning objectives, alignment with ongoing GAC and ICANN policy work, greater use of online and modular formats where appropriate, and approaches that accommodate both in-person and remote participation.

In addition, the draft proposal outlines potential areas of responsibility for the CDWG, such as maintaining a longer-term capacity development curriculum, developing onboarding materials for new representatives, identifying and prioritizing learning needs, coordinating with ICANN org, and assessing effectiveness through feedback and continuous improvement mechanisms.

The document further includes draft Terms of Reference for discussion, covering possible composition, working modalities, and deliverables for the Working Group. Examples mentioned in the proposal include supporting longer-term planning for capacity development activities, proposing capacity development sessions ahead of ICANN meetings, and maintaining a centralized repository of materials and onboarding resources on the GAC website.

Key Reference Resources

- [GAC Annual Plan 2025/2026](#)
- [GAC Criteria for Submission to the 2026 ICANN Nominating Committee](#)
- [GAC Capacity Development Working Group Proposal](#)

Document Administration

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DNS Abuse Mitigation

GAC Plenary Session 11, 11a and GNSO PDP1 WG Sessions

Contents

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Session Objectives: GAC Plenary Session (Agenda Item 11)

DNS Abuse is a priority issue for the GAC. Continuing on a program proposed since ICANN81 by the GAC co-leads for DNS Abuse (European Commission, Japan, and the United States), covering the 2024 global amendments to ICANN's Registry Agreement and Registrar Accreditation Agreement, which created obligations for domain name registries and registrars to mitigate or otherwise disrupt DNS Abuse, and taking into account the [GAC 2025/2026 Annual Plan](#) which sets out a two-pronged approach to the GAC's work on DNS Abuse, focusing on: 1) advancing policy work, and 2) developing the capacity of GAC members on this subject, during ICANN86 the GAC will discuss:

- Status of deliberations of the Policy Development Process (PDP) Working Group on Associated Domain Checks launched in Mumbai, including preliminary proposals in response to charter questions and related areas of convergence and divergence between the GAC and the different communities participating in the PDP
- Potential topics for future work in the ICANN community, as previously identified by the GAC and as discussed in the Preliminary Issue Report on a DNS Abuse PDP, for future targeted policy development, contractual negotiations between ICANN and Contracted Parties, or non-binding efforts (e.g., sharing best practices) and cooperation between relevant stakeholders;
- Possible DNS abuse mitigation efforts conducted outside ICANN's remit.

Session Objectives: GAC Plenary discussion with ICANN stakeholders (Agenda Item 11a)

While ICANN Policy Forums do not provide enough time for bilateral meetings with various community groups, this session will provide an opportunity for interesting constituencies to share with the GAC their policy priorities as it relates to DNS Abuse mitigation. It is also expected that community experts will share their experience and research findings regarding the DNS Abuse landscape.

Session Objectives: GNSO PDP1 WG Sessions

The GNSO Council requested an Issue Report on DNS Abuse in August 2025. A [Preliminary Issue Report on a DNS Abuse PDP](#) (8 September 2025) was [finalized](#) in December 2025 following [input from the ICANN community](#), including [GAC Comments](#) (18 October 2025). Subsequently, the GNSO Council determined to initiate two PDPs on Associated Domain Checks (PDP1) and on Safeguards for Unrestricted Application Programming Interface (API) access to new customers (PDP2).

While formation of PDP2 is expected at a later time, the GNSO has formed the PDP1 Working Group, which was convened for the first time during ICANN85. The GAC is represented by 4 delegates, and numerous observers that have been working to prepare and coordinate GAC input within the GAC Small Group on DNS Abuse.

Throughout the duration of ICANN86, the DNS Abuse PDP1 Working Group is expected to hold 4 sessions, during which participants are expected to continue deliberating on the charter questions as defined by the GNSO Council in the [PDP1 Working Group Charter](#), towards seeking to issue an Initial Report by February 2027.

Leadership Proposal for GAC Action

1. **Consider refining GAC positions based on initial deliberations in the GNSO DNS Abuse PDP1 on Associated Domain Checks**, consistent with GAC expectations laid out in the [GAC Comments](#) (18 October 2025) on the Preliminary Issue Report, as well as the [initial GAC Positions on the DNS Abuse PDP1 Charter Questions](#) (March 2026).
2. **Continue considering GAC and community input on the proposals regarding future DNS Abuse policy development** in response to the [public comment proceeding](#) on the [Preliminary Issue Report on a DNS Abuse PDP](#) (8 September 2025), and particularly [GAC Comments](#) (18 October 2025) with regards to:
 - **Process and timeline to achieve enforceable obligations** on all gTLDs before the next round of New gTLDs on the remaining issue identified for immediate policy development: **Unrestricted Application Programming Interface (API) access for high-volume registrations** (also referred in previous community discussions as “bulk domain registrations”);
 - **Possible paths to address the remaining issues** (or “gaps”) included in the Preliminary Issue Report but not currently prioritized for immediate policy development, and which remain GAC priorities, such as:
 - **Proactive monitoring as part of preventative measures** (see gaps “P6. Challenges in Real time Detection of Short Lived Abuse” p.15 of the Preliminary Issue Report, and “P7. Underuse of Predictive Algorithms for Early Detection” p.16);
 - **Addressing registration data accuracy** (see gaps “P2 and P3:Lack of proactive/Timely contact verification” which recall the recommendation of the GNSO Small Team on accuracy of registration data; and “P8. No Post-Registration Identity Checks for Suspicious Activity”);
 - **Increased transparency in the reporting obligations** (see gap “C1. Limited Transparency in Mitigation Actions” p.23);
 - **Consensus policy on subdomain abuse** (see gap C4 “Unregulated subdomain abuse” p.26)
 - **Centralized coordination mechanism for DGA Botnet attacks** (see gap CC1 “Lack of Coordination during Domain Generation Algorithm (DGA) Botnet Attacks” p. 32)
3. Specifically, **seek progress on the re-examining of the current 15-day timeline for registrars to validate and verify registrants contact information**, during a GAC-hosted informational session during ICANN86 (agenda item 6.a on Tuesday 9 June at 12:30 local time) following a [GAC Chair correspondence](#) (11 May 2026) seeking a reconvened trilateral dialogue between the GAC, the ICANN Board and the GNSO.

Current Status and Recent Developments

- **Policy development regarding the prevention and mitigation of DNS Abuse** has been increasingly called for by various stakeholders groups, in light of the expected expansion of the DNS in the Next Round of New gTLDs, and including during the negotiation and subsequent adoption of [new Contractual Requirements for Registries and Registrars to mitigate DNS Abuse](#) which entered into force on 5 April 2024 (see next section of this briefing) which were understood as a “first step”. Subsequently, momentum built within the ICANN Community for consideration of policy development around specific issues identified in several industry and research contributions ([INFERMAL Report](#) and [NetBeacon White Paper](#)).

Since the GAC issued Consensus Advice to the ICANN Board in the [GAC Prague Communiqué](#) (16 June 2025) “to urge the GNSO Council to undertake all necessary preparations prior to ICANN84 towards starting targeted and narrowly scoped Policy Development Processes (PDPs) on DNS Abuse issues”, **the Bylaw-mandated procedural steps were taken to enable the convening of the GNSO DNS Abuse Mitigation PDP1 on Associated Domain Checks during ICANN85.**

- Per the [ICANN69 GAC Communiqué](#) (23 October 2020), ***“From the GAC’s perspective, the momentum has been increasingly building for concrete action as the Community has progressively engaged in constructive dialogue to advance work on a shared goal, the mitigation of DNS abuse. Beginning with the recommendations from the CCT-RT and the SSR2 RT and continuing through several cross-community sessions and more recent work on a DNS Abuse Framework, the GAC believes there is now a solid expression of broad support for concrete steps to be taken to address the core components of effective DNS abuse mitigation”.***
- On 31 January 2022 the GNSO Council [formed](#) a **GNSO Small Team on DNS Abuse** expected to determine “what policy efforts, if any, the GNSO Council should consider undertaking to support the efforts already underway in the different parts of the community to tackle DNS abuse”.
- In [The Hague Communiqué](#) (20 June 2022), the GAC stated that ***“any PDP on DNS Abuse should be narrowly tailored to produce a timely and workable outcome”*** to which the ICANN Board responded that it shares this view and is prepared to support the ICANN community in such pursuits¹.
- **The GNSO Small Team recommended** in a [Report to the GNSO Council](#) (7 October 2022): **the initiation of a tightly scoped policy development on malicious registrations (Rec. 1), further exploration of the role of bulk registrations play in DNS Abuse and measures already in place to address it (Rec. 2), encouraging further work towards easier, better and actionable reporting of DNS Abuse (Rec. 3), and possible work between Contracted Parties and ICANN Compliance regarding its findings on potential gaps in interpretation and/or enforcement of the current ICANN contracts (Rec. 4).** The GNSO Council proceeded with recommended outreach to [Contracted Parties](#) regarding Rec. 3 and to

¹ See <https://gac.icann.org/sessions/boardgac-interaction-group-bgig-call-31-august-2022> (31 August 2022) [prior GAC website login required]

[Contracted Parties, the DNS Abuse Institute and ICANN Compliance](#) regarding Recommendation 2 (6 January 2023).

- Regarding bulk registrations, the [ICANN Compliance response to the GNSO Council](#) (22 February 2023) states that *‘ICANN agreements and policies do not contain requirements or limitations related to registering domain names in bulk. As a result, **ICANN Contractual Compliance does not collect or track information on bulk registrations, [or] the potential role these may play in Domain Name System (DNS) abuse**’.*
- Based on further input received from Contracted Parties², the **GNSO Small Team on DNS Abuse concluded**, as part of its [Preliminary Findings Preliminary Finding on Bulk Registrations](#) (15 May 2023), that **the topic of bulk registrations “does not fall within the realm of Consensus Policy at the moment”** to the extent that:
 - Complaints from single or multiple registrations are handled uniformly, without clarity on what might constitute bulk registrations warranting targeted reactions.
 - The lack of a clear definition did not elicit a clear response.
 - Other Know Your Customer tools are deemed more efficient in detecting potential abuse, and should warrant more attention.
 - ICANN’s recently started [Inferential Analysis of Maliciously Registered Domains \(INFERMAL\)](#) project seems to indicate a willingness from the org. to look into this matter and provide [...] better statistics and intelligence [on this matter]
- The [GAC Comments](#) (17 July 2023) on the [Amendments to the Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations](#) stated that **“subsequent work with the multistakeholder community on DNS Abuse [...] should include Policy Development Processes (PDPs) to further inform the updated RA and RAA, as well as other work on outstanding issues to address prior to the next application round for New gTLDs.”**
- In the [summary report of Public Comments on the new Contract Amendments](#) (1 August 2023) ICANN org noted *“the ICANN community will have the opportunity to discuss these obligations and determine if further obligations are required [...]. **ICANN org and the CPH [Negotiation Team] support the comments from the GAC which stated that after the proposed amendments are adopted, work should include Policy Development Processes (PDPs) to further inform the updated Base RA and RAA.**”*
- **The ICANN Board indicated**, during a GAC/Board interaction on the ICANN79 San Juan Communiqué (13 May 2024)³ that while Compliance reports are expected to contribute to measuring the impact of the DNS Abuse Amendments, **it would be up to a community-led effort, facilitated and supported by ICANN, to determine the specific metrics and data sets that will allow measurement** of such an impact. In [response to Issues of Importance in the ICANN80 Kigali Communiqué](#) (15 October 2024), the ICANN Board further stated that *“It is important to allow sufficient time for the implementation of the new amendments and to accurately measure impact. For example, **Compliance metrics, while an important data source, alone cannot be relied on to measure the***

² See correspondence from the [Contracted Parties House \(CPH\)](#), [Registry Stakeholder Group \(RvSG\)](#) and [Registrar Stakeholder Group \(RrSG\)](#)

³ See [ICANN Board Comments on Issues of Importance in the ICANN79 San Juan Communiqué](#) (9 May 2024)

overall impact of the DNS Abuse Amendments. *Compliance has visibility over the instances of DNS Abuse that are subject of Compliance's cases, but not over the entire DNS market and how contracted parties or other actors within the DNS ecosystem address DNS Abuse".*

- On 15 May 2025, the [GNSO Small Team on DNS Abuse](#) **was reconvened following the GNSO Council's revisiting the topic of DNS as a potential area for future policy work** in light of contract amendments between ICANN and contracted parties now in effect and related data from ICANN Compliance being available. The [Assignment](#) (29 April 2025) of the reconvened GNSO Small Team included:
 - Evaluating DNS Abuse mitigation efforts across ICANN including potential outreach to the broader ICANN community to seek input on suitable areas for policy development
 - Assessing the impact of the Contract amendments on DNS abuse mitigation efforts;
 - Discussing with relevant stakeholders and providing a summary on the insights from the INFERMAL study and how these insights can help inform next steps on DNS Abuse;
 - Recommending the GNSO Council potential next steps (policy, further research, community/industry collaboration etc.) that may be needed to address DNS Abuse.
- **The INFERMAL project's [Final Report](#)** (8 November 2024), which conducted analysis of maliciously registered domains, was highlighted in the [GAC Istanbul Communiqué](#) (18 November 2024), presented to the ICANN Community in a [Pre-ICANN82 webinar](#) (19 February 2025) and discussed between the GAC, ALAC, SSAC, GNSO and in GAC plenary during ICANN82 (see [ICANN82 GAC Meeting Minutes](#)).
- **The NetBeacon Proposals for PDPs on DNS Abuse**, published in the form of a [White Paper](#) (21 May 2025) offered 5 topics for “*tightly scoped PDPs*” that are “*designed to address a discrete problem without creating undue complexity or overreach*”:
 - **Associated Domain Check:** A reactive approach requiring registrars to investigate domains linked to malicious actors, particularly in cases of bulk domain registrations used for abuse campaigns.
 - **Friction in Bulk Registrations for New Customers:** A proactive approach that seeks to introduce friction for new customer accounts, prior to gaining access to high volume registration tools (i.e., API access for new customers), until trust is established.
 - **Subdomain DNS Abuse:** A proposal to help address the growing abuse of subdomain services by codifying the responsibilities of registrants who offer them, via requirements in registrar and registry terms of service.
 - **Registrant Recourse Mechanisms:** A measure that ensures registrants have a path to challenge enforcement actions of registrars or registries when taken in error.
 - **Centralized Coordination on DGA Malware and Botnets:** A proposal to have ICANN serve as a coordination hub for law enforcement and national CERTs in cases involving DGA-based malware and botnets, enabling more efficient, synchronized mitigation.
- In the ICANN83 [GAC Prague Communiqué](#) (16 June 2025), **the GAC advised the ICANN Board to “urge the GNSO Council to undertake all necessary preparations prior to**

*ICANN84 towards starting **targeted and narrowly scoped Policy Development Processes (PDPs) on DNS Abuse issues**, prioritizing bulk registration of malicious domain names and the responsibility of registrars to investigate domains associated with registrant accounts that are the subject of actionable reports of DNS Abuse.”*

- In the [ICANN Board Action](#) (14 Sept. 2025) in response to the ICANN83 GAC Advice, the ICANN Board noted the GNSO Council’s request for an Issue Report from ICANN org on DNS Abuse⁴, as had been recommended by the [GNSO Small Team on DNS Abuse](#) (31 July 2025), and **stressed that this Issue Report “is a critical milestone in the process to launch a PDP, and will include an exploration of the three policy enhancements highlighted by the GAC as priority items, as well as additional items discussed in the small team’s report, and a proposal for a narrowly chartered PDP(s) that can be completed swiftly.”** The ICANN Board also stated that “*The Bylaws-mandated step to develop the Issue Report is in place to ensure that a PDP is appropriately scoped within ICANN’s Mission and the policy issues are well defined. While this means that a PDP will not be finally initiated by ICANN84, the Board appreciates the commitment from the community and ICANN staff to establish the foundation to initiate the PDP as expeditiously as possible, presuming the Council determines a PDP is warranted*”
- **Prior to ICANN84**, and in response to the [ICANN Public Comment proceeding on the Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation](#) (8 Sept. 2025), the [GAC Comments](#) (18 Oct. 2025) **highlighting the need for:**
 - **Process and timeline clarifications to achieve enforceable obligations** on all gTLDs before the next round of New gTLDs on the two issues identified for immediate policy development:
 - **Unrestricted Application Programming Interface (API) access for high-volume registrations** (also referred in previous community discussions as “bulk domain registrations”)
 - **Associated Domain Checks** (duty for registrars to proactively investigate other domains registered by a particular registrant or account when abuse is identified on one of their domains)
 - **Clarification of possible paths to address the remaining issues** (or “gaps”) included in the Preliminary Issue Report but not currently prioritized for immediate policy development, and which remain GAC priorities, such as:
 - **Proactive monitoring as part of preventative measures** (see gaps “P6. Challenges in Real time Detection of Short Lived Abuse” p.15 of the Preliminary Issue Report, and “P7. Underuse of Predictive Algorithms for Early Detection” p.16);
 - **Addressing registration data accuracy** (see gaps “P2 and P3:Lack of proactive/Timely contact verification” which recall the recommendation of

⁴ On 14 August 2025, the GNSO Council resolved, as part of [resolution 20250814-1](#) that “*The GNSO Council accepts the recommendations as outlined in the DNS Abuse Small Team report and requests that an Issue Report be initiated on the topics as outlined by the Small Team and requests that Staff create the report.*”. See also p.3 of the [vote results](#) on this resolution.

- the GNSO Small Team on accuracy of registration data; and “P8. No Post-Registration Identity Checks for Suspicious Activity);
- **Increased transparency in the reporting obligations** (see gap “C1. Limited Transparency in Mitigation Actions” p.23).
 - **Consensus policy on subdomain abuse** (see gap C4 “Unregulated subdomain abuse” p.26)
 - **Centralized coordination mechanism for DGA Botnet attacks** (see gap CC1 “Lack of Coordination during Domain Generation Algorithm (DGA) Botnet Attacks” p. 32)
- Following the publication of [ICANN’s Report of Public Comments](#) (17 November 2025), the [Final Issue Report on a Policy Development Process on DNS Abuse Mitigation](#) was released (4 December 2025) and the **GNSO Council resolved** (11 December 2025) to:
 - **First, launch PDP1 on Associated Domain Check**, and form a GNSO Small Team to revise the charter to address concerns from representatives of the Non-Contracted Stakeholder Group (NCSG)⁵
 - **Delay the launch of PDP2 on Safeguards for Unrestricted Application Programming Interface (API) access to new customers** (previously known as “Bulk Registration”) to *“when deemed appropriate based upon the progress and resources needed for PDP1”*
 - The [Charter for the PDP1 Working Group](#) on Associated Domain Checks was **adopted by the GNSO Council** (15 January 2026) which then launched the [Call for designation of community representatives](#) to join the PDP Working Group.
 - In the meantime, **in January 2026, the GAC established its Small Group on DNS Abuse** to *“support and advance strong government engagement of the GAC in DNS Abuse policy development at ICANN”*. This GAC Small Group, composed of 17 GAC and PSWG participants from 12 GAC delegations, has been meeting weekly to prepare the GAC’s engagement in the GNSO DNS Abuse PDP1 Working Group. In coordination with the GAC Leadership, the Small Group **proposed that the following individuals represent the GAC consistent with the agreed composition of the PDP1 WG:**
 - **Martina Barbero** (European Commission)
 - **Gabriel Andrews** (US FBI, PSWG Co-Chair)
 - **Wolfgang Holzapfel** (Germany, PSWG)
 - **Naoum Mengoudis** (Hellenic Police/Europol EMPACT, PSWG)
 - During a pre-ICANN86 [Prep Week update webinar](#) (20 May 2026), the Working Group reported on its 12 meetings to date and share the current “direction of deliberations” on the key charter questions as reflected in the [DNS Abuse Mitigation PDP1 Working Group Coordination Document](#):

⁵ NCSG concerns had been raised in [Comments](#) (18 October 2025) on the Preliminary Issue Report and were further laid out in GNSO [email correspondence](#) prior to the 11 December 2025 GNSO meeting.

- Trigger for Associated Domain Check (Question 1): Section 3.18.2 of the Registrar Accreditation Agreement (RAA)⁶
 - Criteria to define association between domains (Question 2): Review Registered Name Holder or account-related indicator, technical or coordinated activity/behavioural indicator, that is reasonably accessible to the registrar.
 - What constitutes a "reasonable investigation" by a registrar (Question 3): Apply association criteria for ADC in a reasonable and proportionate manner.
 - What data access and privacy safeguards are necessary (Question 4): An ADC MUST be conducted in compliance with applicable law, contractual requirements, and data privacy safeguards.
 - Remedies in case of adverse impact on registrants (Question 5): Certain existing procedures, contractual obligations, and legal frameworks already provide safeguards relevant to conducting ADC. Impact Assessment yet to be conducted.
 - Timeline for conducting an Associated Domain Check (Question 6): Initiate and conduct ADC promptly following the receipt or identification of actionable evidence of DNS Abuse.
- During ICANN86, the DNS Abuse PDP1 Working Group will meet across four sessions from Monday 8 to Thursday 11 June⁷.

⁶ See <https://itp.cdn.icann.org/en/files/accredited-registrars/registrar-accreditation-agreement-21jan24-en.htm>

⁷ See ICANN88 Schedule for [Session 1](#), [Session 2](#), [Session 3](#) and [Session 4](#).

- **Amendments of the Registry and Registrar Agreements to Enhance DNS Abuse Mitigation Obligations**

- In the ICANN76 [Cancún Communiqué](#) (20 March 2023), the GAC encouraged the ongoing negotiations “to proceed expeditiously” and noted that it “considers that **continued efforts in this area will be required, including further improvement of contractual obligations and/or targeted policy development processes prior to the launch of a second round of New generic Top-Level Domains (new gTLDs)**.” In addition, the GAC encouraged “Contracted Parties and ICANN to further consider, inter alia, proactive measures as well as positive incentives for registries and registrars in future work on DNS abuse mitigation or disruption.”
- In preparation for ICANN77, the **GAC Underserved Regions Working Group (USRWG)** organized two **webinars** to prepare newcomers and underserved regions GAC representatives to contribute to a Comment on the expected amendments of the Registry and Registrar contracts⁸.
- **ICANN org initiated a public comment proceeding** on the [Amendments to the Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations](#) (29 May 2023) which were subsequently presented in a [ICANN77 Prep Week webinar](#) (30 May 2023). Among the various changes proposed to ICANN’s contracts, the amendments include a **new requirement to promptly take appropriate mitigation actions against domains for which the contracted party has actionable evidence** demonstrating that the domains are being used for DNS Abuse. In addition to the [proposed contract amendments](#), a [draft ICANN Advisory](#) provides detailed explanation of the new provisions and sets expectations as to their interpretation.
- Following its discussions of the proposed amendments during ICANN77⁹, [GAC Comments](#) (17 July 2023) were submitted in the public comment proceeding:
 - The GAC noted that the amendments are “*timely and relevant and, when adopted, will represent an important first step forward to combat DNS Abuse.*”
 - The GAC stressed “*In light of the ongoing threat that DNS Abuse poses to consumers and the public and private sectors*”, that “*it is imperative that the improved contracts are swiftly adopted following the completion of the Public Comment process*”
 - **The GAC expressed support for “the proposed amendments as a general matter” but invited “ICANN org and the CPH NT to consider some specific issues related to the text of the amendments”.** These include: the DNS Abuse definition; reporting and monitoring by Contracted Parties; consequence for non compliance; providing the ICANN community the ability to monitor how compliance is enforced; the need for the Advisory to be updated from time to time; and the need to address DNS Abuse both inside and outside of ICANN.
 - **The GAC indicated looking forward to “engaging in subsequent work with the**

⁸ See [Pre-ICANN77 GAC Capacity Development Webinar on DNS abuse #1](#) (4 May 2023) and [Webinar #2](#) (22 May 2023)

⁹ See [ICANN77 GAC Capacity Development Workshop on DNS Abuse](#) (Sunday 11 June) and [GAC Discussion on DNS Abuse](#) (Wednesday 14 June)

*multistakeholder community on DNS Abuse after the amendments are adopted. **This work should include Policy Development Processes (PDPs) to further inform the updated RA and RAA, as well as other work on outstanding issues to address prior to the next application round for New gTLDs.***

- In its [Public Comment Summary Report](#) (1 August 2023), ICANN org indicated that **voting by registries and registrars will proceed on the amendments as initially proposed** and noted “[r]egarding comments that the proposed amendments are insufficient to address the challenge of DNS Abuse”: ICANN org acknowledges the comments and reminds the community that the ICANN community will have the opportunity to discuss these obligations and determine if further obligations are required [...]. **ICANN org and the CPH [Negotiating Team] support the comments from the GAC which stated that after the proposed amendments are adopted, work should include Policy Development Processes (PDPs) to further inform the updated Base RA and RAA.**
- [Voting by registries and registrars](#) on the amendments started on 9 October 2023 for a duration of 60 days and concluded successfully with 80% of affirmative votes by Registries and 94% approval by Registrars¹⁰.
- The ICANN Board subsequently [resolved to approve the amendments](#) (21 January 2024) and determined that **“no further revisions to the proposed Global Amendments are necessary after taking the public comments and voting results into account”**.
- The [Amendment of the Registry Agreement](#), the [Amendment of the Registrar Accreditation Agreement](#) and the related [Advisory: Compliance With DNS Abuse Obligations in the Registrar Accreditation Agreement and the Registry Agreement](#) were published on 5 February 2024 and became effective on 5 April 2024¹¹.
- In the [ICANN79 GAC San Juan Communiqué](#) (11 March 2024), the GAC stated that it “will track reports from ICANN Compliance on DNS Abuse enforcement” and that “there remains a general expectation that significant progress occur in advance of the next round of new gTLD applications”.
- In its [ICANN Board Comments on Issues of Importance in the ICANN79 San Juan Communiqué](#) (9 May 2024) regarding the ICANN79 Communiqué, the ICANN Board stated: **“the intent is that Compliance’s reports contribute to measuring the impact of the DNS Abuse Amendments. However, determining the specific metrics and data sets that will allow measurement of such an impact should be a community-led effort, facilitated and supported by ICANN”**. It further indicated that “an ICANN org cross-functional team working on analyzing the information and determining how to approach these efforts.”
- During the GAC and [ICANN Board discussion](#) (21 October 2024) of the Issues of Importance identified in the [ICANN80 Kigali Communiqué](#) (17 June 2024), the ICANN Board stressed that the new amendments “empower ICANN Contractual Compliance

¹⁰ Detailed voting results available at <https://www.icann.org/resources/pages/global-amendment-2024-en>

¹¹ See notices sent by ICANN org to [Registry Operators](#) and [Registrars](#) (5 Feb. 2024)

(Compliance) to take enforcement actions against registrars or registries who fail to adequately mitigate or disrupt well evidenced DNS abuse”

- As it relates to measuring the **impact and effectiveness of the new DNS Abuse amendments**, the ICANN Board stated *“It is important to allow sufficient time for the implementation of the new amendments and to accurately measure impact. For example, **Compliance metrics, while an important data source, alone cannot be relied on to measure the overall impact of the DNS Abuse Amendments.** Compliance has visibility over the instances of DNS Abuse that are subject of Compliance’s cases, but not over the entire DNS market and how contracted parties or other actors within the DNS ecosystem address DNS Abuse. Accordingly, **Compliance data can be considered alongside that of other third-party experts who also capture nuanced metrics.** For instance [Net Beacon’s MAP](#) contains metrics across the global gTLD domain name market such as normalized abuse rates, median time to mitigate, and viewpoint of malicious versus compromised names.”*
- **ICANN Contractual Compliance** provides regular updates on its enforcement efforts regarding the new contractual requirements. This included most recently:
 - A [Webinar update on the first year of enforcing the DNS Abuse mitigation obligations](#) (23 April 2025),
 - A [Contractual Compliance Update](#) during the ICANN84 Prep Week (14 October 2025)
- During ICANN85 Prep Week, a [Contractual Compliance Update](#) is expected on Tuesday 24 February at 19:30 UTC. This update is expected to discuss the recent [announcement](#) of the [2026 gTLD Registry Audit Report](#) (29 January 2026) of 21 gTLD Registries which included the assessment of compliance with the new DNS Abuse Mitigation contractual obligations (p.6) as well as “key audit findings related to DNS Abuse” (p.10) covering:
 - Public abuse reporting mechanisms
 - Means of conducting DNS Abuse technical analysis and maintaining statistical reports
 - DNS Abuse detection and mitigation

- **Specific ICANN Reviews recommendations related to DNS Abuse¹²**

- **The SSR2 Review delivered 63 recommendations** in its [Final Report](#) (25 January 2021) with a significant focus on measures to prevent and mitigate DNS Abuse.
 - The GAC considered a [Draft SSR2 Review Report](#) (24 January 2020) and endorsed many of the draft recommendations in a [GAC Comment](#) (3 April 2020). These were followed by [GAC Comments](#) (8 April 2021) on the final recommendations, and subsequent GAC Advice in the [ICANN72 Communiqué](#) (1 Nov. 2021) requesting follow-up action and further information on levels of implementation of certain recommendations, to which the ICANN Board [responded](#) (16 Jan. 2022), leading to further discussions during ICANN73¹³, and communications by ICANN org to the GAC in a [letter](#) (18 March 2022) and a [follow-up email](#) (12 April 2022).
 - Based on the [ICANN Specific Review Quarterly Report](#) (31 March 2024), and based on several ICANN Board resolutions ([22 July 2021](#), [1 May 2022](#), [16 November 2022](#) and [10 September 2023](#)): **23 recommendations** are now **approved** (including 14 subject to prioritization for implementation), **38 rejected**, and **1 pending** further information.
 - On [10 September 2023](#), the **ICANN Board rejected 6 of the 7 Pending Recommendations relating to DNS Abuse** based on [assessment by ICANN org](#) - **12.1** (*DNS Abuse Analysis advisory team*), **12.2** (*structure agreements with data providers to allow further sharing of the data*), **12.3** (*publish reports that identify registries and registrars whose domains most contribute to abuse*), **12.4** (*report actions taken by registries and registrars to respond to complaints of illegal and/or malicious conduct*), **13.1** (*central DNS abuse complaint portal mandatory for all gTLDs*), **13.2** (*publish complaints data for third party analysis*) and **14.2** (*provide contracted parties with lists of domains in their portfolios identified as abusive*)
 - **In its discussion of contract negotiations on DNS Abuse, the GAC PSWG discussed¹⁴ several SSR2 recommendations that have been rejected** by the ICANN Board per the [Board Scorecard](#) (22 July 2021) - **8.1** (*commission a negotiating team that includes abuse and security experts to renegotiate contracted party contracts*), **9.4** (*regular compliance reports enumerating missing tools*), **14.4** (*provide contracted parties 30 days to reduce the fraction of abusive domains below the threshold*) and **14.5** (*consider offering financial incentives*) - **for which the GAC acknowledged** in the [GAC ICANN72 Communiqué](#) (1 November 2021) *“the procedural bases for the Board’s rejection”* noting, nevertheless, ***“the useful substantive aspects of certain rejected recommendations, including those that aim to provide ICANN org and ICANN Contractual Compliance with appropriate tools to prevent and mitigate DNS abuse”***.

¹² The status of all recommendations may be consulted in the ICANN’s Quarterly Reports, the home page of each review, all accessible from <https://www.icann.org/resources/reviews/specific-reviews>

¹³ See [ICANN73 GAC Minutes](#) p.13

¹⁴ See [PSWG Conference Call](#) on 14 February 2023 [prior GAC website login required]

- The **Competition, Consumer Trust & Consumer Choice Review Team's [Final Report](#)** (8 Sep. 2018) provided 35 recommendations. In the [Montréal Communiqué](#) (6 Nov. 2019), as clarified in subsequent [correspondence with the ICANN Board](#) (Jan. 2020), **the GAC advised the ICANN Board “not to proceed with a new round of gTLDs until after the complete implementation of the recommendations [...] that were identified as ‘prerequisites’ [14 recommendations] or as ‘high priority’ [10 recommendations].”** Following discussions related to the ICANN70 and ICANN71 Communiqués¹⁵, the GAC and ICANN Board agreed on an understanding stated in a [GAC/Board BGIG Call](#) (5 October 2021) [GAC Website Login required] as “the GAC would consider follow-up on the substance of the CCT Review recommendations and not the specific recommendations themselves.” Several of these recommendations were relevant to contract negotiations on DNS Abuse and were discussed by the GAC PSWG¹⁶:
 - **Recommendation 17** (collect data about and publicize the chain of parties responsible for domain name registrations) **was approved and implementation is complete** per its [Implementation documentation](#) as of 14 Sep. 2022.
 - **Recommendation 13** (collect data on impact of registration restrictions which the GAC noted “would allow for more informed decision and policy making with regard to future standard registry and registrar contract provisions”) and **Recommendation 20** (assess mechanisms to report and handle complaints and possibly consider amending future standard Registry Agreements to require registries to more prominently disclose their abuse points of contact and provide more granular information to ICANN) were approved in part per [Board Scorecard of 22 October 2020](#), and **their implementation is in progress with completion estimated between Q3 2023 and Q2 2024** according to the [ICANN Specific Reviews Q1 2023 Quarterly Report](#) (31 March 2023)
 - **Recommendation 14** (incentives to adopt proactive anti-DNS Abuse measures) and **Recommendation 15** (negotiate amendments to include provisions aimed at preventing systemic use of specific registrars or registries for DNS Security Abuse, and establish thresholds of abuse for automatic compliance triggers) **were rejected by the ICANN Board** ([resolution](#) of 10 September 2023)
- The **RDS-WHOIS2 Review recommendations LE.1 and LE.2** which sought “regular data gathering through surveys and studies to inform a future assessment of the effectiveness of RDS (WHOIS) in meeting the needs of law enforcement” and “conducting comparable surveys and/or studies with other RDS (WHOIS) users working with law enforcement on a regular basis” are now **considered to be “implemented to the extent possible”** in connection with work of EPDP Phase 2 and 2A as well as the SSAD ODP, per the [Implementation Documentation](#) (11 October 2022)

¹⁵ See Communiqué clarification discussions and eventual Board responses to the GAC's Follow-up on Previous Advice in the ICANN70 Communiqué and ICANN71 Communiqué: ICANN70 [Clarification call](#) (21 April 2021) and [Board response](#) (12 May 2021), and ICANN71 [Clarification call](#) (29 July 2021) and [Board response](#) (12 September 2021).

¹⁶ See [PSWG Conference Call](#) on 14 February 2023 [GAC website login required]

Key Reference Documents

- [ICANN86 Prep Week DNS Abuse Mitigation PDP 1 Working Group Update](#) (20 May 2026). [collaboration document](#) and [workspace](#).
- [Charter for the PDP1 Working Group](#) on Associated Domain Checks (15 January 2026)
- [Final Issue Report on a Policy Development Process on DNS Abuse Mitigation](#) (4 December 2025)
- [GAC Comments on the Preliminary Issue Report regarding DNS Abuse](#) (18 October 2025))
- [ICANN Board Action](#) in response to the ICANN83 GAC Advice (14 Sept. 2025)
- [Preliminary Issue Report on a PDP on DNS Abuse Mitigation](#) (8 Sept. 2025)
- [Report to the GNSO Council of the Small Team on DNS Abuse](#) (31 July 2025)
- ICANN83 [GAC Prague Communiqué](#) (16 June 2025) including GAC Advice to the ICANN Board regarding Policy Development on DNS Abuse issues
- [NetBeacon White Paper: Proposal for PDPs on DNS Abuse](#) (21 May 2025)
- [ICANN Contractual Compliance update on the first year of enforcing the DNS Abuse mitigation obligations](#) (23 April 2025)
- [ICANN Board Comments on Issues of Importance in the ICANN82 Seattle Communiqué](#) (4 April 2025)
- [ICANN Board Comments on Issues of Importance in the ICANN81 Istanbul Communiqué](#) (29 January 2025)
- INFERMAL project's [Final Report](#) (8 November 2024)
- SSAC [SAC115 Report](#) (19 March 2021), a proposal for an Interoperable Approach to Addressing Abuse Handling in the DNS and a the recent [Pre-ICANN81 GAC Webinar on DNS Abuse mitigation \(4 October 2024\)](#) which provided status on the implementation of the SSAC recommendations.
- [ICANN Contractual Compliance New DNS Abuse Monthly Reports](#) (since April 2024)
- [ICANN Board Comments on Issues of Importance in the ICANN80 Kigali Communiqué](#) (15 October 2024)
- [ICANN Board Comments on Issues of Importance in the ICANN79 San Juan Communiqué](#) (9 May 2024)
- [Contracted Parties Summit](#) (6-9 May 2024) and [recordings of the open sessions](#).
- [Amendment of the Registry Agreement](#), [Amendment of the Registrar Accreditation Agreement](#) and related [Advisory: Compliance With DNS Abuse Obligations in the Registrar Accreditation Agreement and the Registry Agreement](#) (published on 5 February 2024, effective on 5 April 2024).
- [ICANN Board resolution](#) (21 January 2024) approving the Amendments of the Registry and Registrar Agreements regarding DNS Abuse

- [ICANN Board Resolution](#) (10 September 2023) based on [ICANN org assessment](#) of pending CCT and SSR2 Review pertaining to DNS Abuse Mitigation
- ICANN org [Public Comment Summary Report](#) (1 August 2023) on Public Comment proceeding related to the proposed Amendments of the Registry and Registrar Agreements regarding DNS Abuse
- [GAC Comments](#) (17 July 2023) on the proposed Amendments of the Registry and Registrar Agreements regarding DNS Abuse
- [Contractual Compliance November 2022 Round Registrar Audit Report](#) (22 June 2023)
- [Amendments to the Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations](#) (29 May 2023)
- [Inferential Analysis of Maliciously Registered Domains \(INFERMAL\)](#) announcement (25 April 2023)
- [GNSO Small Team on DNS Abuse Report to the GNSO Council](#) (7 October 2022)
- [The Last Four years in Retrospect: A Brief Review of DNS Abuse](#) by ICANN org (22 March 2022)
- European Commission [Study on DNS Abuse](#) and its [Technical Appendix](#) (31 January 2022)
- SSR2 Review [Final Report](#) (25 January 2021) and related [GAC Comments](#) (8 April 2021)

Document Administration

Title	ICANN86 GAC Session Briefing - DNS Abuse Mitigation
Distribution	GAC Members (before meeting) and Public (after meeting)
Distribution Date	Version 1: 25 May 2026

ICANN86 GAC Schedule (as of 26-May-2026)

UTC	UTC+2	Monday 8 June 2026 (Day 1)		Tuesday 9 June 2026 (Day 2)		Wednesday 10 June 2026 (Day 3)		Thursday 11 June 2026 (Day 4)		UTC+2	
8:00	10:00	1. Opening Plenary (75 mins)		4. GAC Discussion on Review of Reviews (45 mins)		GNSO DNS Abuse PDP (3/4) (75 mins)	10. GAC Leadership and Operations Update (75 mins)	12.c. GAC Communique Drafting (75 mins)		10:00	
8:15	10:15									10:15	
8:30	10:30					10:30					
8:45	10:45					10:45					
9:00	11:00					11:00					
9:15	11:15			5. GOPE WG Proposal (30 mins)					11:15		
9:30	11:30	Break (30 mins)		Break (30 mins)		Break (30 mins)		Break (30 mins)		11:30	
9:45	11:45									11:45	
10:00	12:00	GNSO DNS Abuse PDP (1/4) (90 mins)	Review of Reviews (90 mins)	2. GAC Capacity Development (GAC readiness for Next Round) (90 mins)	6. GAC Discussion on Registration Data Issues (45 mins)		11. GAC Discussion on DNS Abuse Mitigation (45 mins)		GNSO DNS Abuse PDP (4/4) (90 mins)	12.d. GAC Communique Drafting (90 mins)	12:00
10:15	12:15										12:15
10:30	12:30										12:30
10:45	12:45										12:45
11:00	13:00										13:00
11:15	13:15					11.a. GAC Discussion on DNS Abuse with relevant SO/AC groups (45 mins)				13:15	
11:30	13:30	Lunch Break (90 mins)		Lunch Break (90 mins)		Lunch Break (90 mins)		Lunch Break (90 mins)		13:30	
11:45	13:45									13:45	
12:00	14:00									14:00	
12:15	14:15									14:15	
12:30	14:30									14:30	
12:45	14:45									14:45	
13:00	15:00	3. GAC Capacity Development (GAC readiness for Next Round) (75 mins)		GNSO DNS Abuse PDP (2/4) (75 mins)	7. GAC Discussion on New gTLDs Next Round (75 mins)	12.a. GAC Communique Drafting (75 mins)		12.e. GAC Communique Drafting (75 mins)		15:00	
13:15	15:15									15:15	
13:30	15:30									15:30	
13:45	15:45									15:45	
14:00	16:00									16:00	
14:15	16:15	Community Session: Current and Coming Impact of Artificial Intelligence on DNS Abuse (90 mins)		8. GAC Meeting with the ICANN Board (60 mins)		12.b. GAC Communique Drafting (90 mins)		Community Session: Cross-Community Dialogue on the Feasibility of a Platform for ASP-Supported New gTLDs (90 mins)		16:15	
14:30	16:30									16:30	
14:45	16:45									16:45	
15:00	17:00									17:00	
15:15	17:15									17:15	
15:30	17:30			9. GAC Communique Review (30 mins)						17:30	
15:45	17:45									17:45	
16:00	18:00	Opening Reception (60 mins)		Networking Cocktail (60 mins)		Networking Cocktail (60 mins)		Closing Reception (60 mins)		18:00	
16:15	18:15									18:15	
16:30	18:30									18:30	
16:45	18:45									18:45	
17:00	19:00									19:00	

GAC Plenary Sessions GAC Joint Sessions Community Sessions GAC Communique GAC Capacity Development	Official Times for ICANN86 10:00-18:00 (UTC+2)
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